Report of Findings and Recommendations

2006 Pilot Survey of Disability Access Services Provided by California Health Plans

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Disclaimer

The Information contained in this report is for the purpose of reporting to the Office of the Patient Advocate (OPA) results and recommendations of the 2006 Pilot Survey of Disability Access Services Provided by California Health Plans.

The report is part of a consulting contract OPA has with The California Foundation for Independent Living Centers (CFILC).

CFLIC has a contract with OPA to provide technical assistance to the Office and its contractors in the development consumer education programs and materials that are targeted and accessible to enrollees with disabilities, and to assist in the development of a pilot survey of health plans. Disability Health Access was contracted by CFILC to assist with the development, distribution and analysis of the pilot survey.

The opinions expressed in this report do not necessarily reflect the opinions of OPA or CFILC, and the recommendations contained in this report should not be interpreted as OPA's policy approach for assessing health care access and quality for this population.



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Introduction

People with disabilities are not only a significant proportion of any health plan's patient population but constitute a potential growth area for health plan market share. Over 54 million Americans have disabilities. One in five people live with at least one disability. With the aging of the baby boomer population, the number and proportion of people with disabilities will increase. Most Americans will experience a disability at some time during their lives. In addition, over 25 million family members provide personal assistance and care. Because of their affiliation with health plan members with disabilities, many of them could potentially become members.

The Office of the Patient Advocate (OPA) is charged with providing consumer education to HMO enrollees and to develop written materials to assist consumers with navigating the managed care system. Additionally, OPA is charged with producing an annual Report Card. The HMO Report Card provides consumers, purchasers, advocates, and regulators with comparative information on the performance of California HMOs and medical groups using clinical and member/patient satisfaction data. Health Plans participate in the HMO Report Card process voluntarily. The HMO Report Card provides health plans with an opportunity to show their commitment to help patients make informed choices about their health care and the health plan that best fits their needs.

This report presents findings from a pilot survey to gather baseline data on the accessibility of California health plans' services for consumers with disabilities. This is OPA's first attempt to examine health care service delivery for consumers with disabilities. The survey results may provide the basis for future OPA program initiatives including targeted consumer education programs and service assessments on the HMO Report Card.

Objectives of the Survey project

- 1. To determine the feasibility of a survey approach to describe and measure services health plans provide enrollees with disabilities.
- 2. To collect baseline data on health plans' disability services.
- 3. To use survey data to establish and evaluate OPA program initiatives targeted to enrollees with disabilities.

Survey Submission

To improve the process by which plans report data, OPA utilized an online reporting system called Zoomerang (see http://www.zoomerang.com). The online survey was submitted to twenty eight (28) health plans on January 11, 2006, with the deadline for submitting responses on February 7, 2006. Utilizing an online survey greatly improved the efficiency of data analysis. However, the online system presented several challenges including:

- limitations in the visual layout for multi-part questions
- limitations in the ability to navigate the questions
- limitations in the ability to print responses when submitted
- limited space to make comments
- limitations in changing responses once submitted.

Survey Design

The survey consisted of twenty-seven (27) questions regarding the extent to which health plans:

- 1. track enrollees disability-related access needs
- 2. provide materials in alternative formats
- 3. offer information regarding the physical accessibility of providers' offices
- 4. provide or assist enrollees with transportation to medical visits, and
- 5. make their web sites accessible to enrollees with disabilities.

Collaborators

OPA collaborated with the California Foundation for Independent Living Centers (CFILC) and The Center for Disability Issues and the Health Professions in the conceptualization of the pilot project and the development of the initial survey instrument.

The California Foundation for Independent Living Centers (CFILC), based in Sacramento, is a statewide, non-profit trade organization made up of 25 independent living centers. CFILC's mission is to support independent living centers in their local communities through advocating for systems change and promoting access and integration for people with disabilities. CFLIC has a contract with OPA to provide technical assistance to the Office and its contractors in the development consumer education programs and materials that are targeted and accessible to enrollees with disabilities and to develop the pilot survey of health plans.

The Center for Disability Issues and the Health Professions is located at the Western University of Health Science and works to enhance the health of people with disabilities through coordinated public policy, training, research, and dissemination activities. The Center provided technical consultation and advice in the development and implementation of the survey project.



Survey Development Process and Timeline

September / October 2005: OPA convened a technical work group to provide the office with review and advice on a draft survey that had been prepared by OPA with input from The Center for Disability Issues in the Health Profession (CDIHP) and revised by Anne Cohen project consultant. The work group included representatives from health plans and consumer advocacy groups who have expertise in providing access to health care services for persons with disabilities. OPA used the feedback from this meeting to revise the draft survey form.

November 2005: OPA convened a public meeting to obtain input from stakeholders and the general public about the survey form and project. Feedback received from the public meeting provided the basis for finalizing the survey content and approach.

December 2005: OPA pilot tested the survey form with a small sample of health plans and made final adjustments to the form to ensure that the survey questions were clear and understood by health plan respondents.

January 2006: The final survey was made available via an online survey tool to 28 commercial and Medi-Cal health plans on January 11th 2006 and were given until February 7th to respond. OPA conducted two training sessions on January 19th and 24th for health plan staff who were responsible for completing the survey.

February 2006: Project consultant conducted analysis of reported data.

March 2006: OPA reconvened the technical work group to review survey results and advise project consultants on the development of a final report.

March 2006: The project consultant submitted a final report and recommendations to OPA.

Acknowledgements

OPA and the contractor greatly appreciate the commitment of time and tremendous insights made by the organizations and individuals involved in this project specifically the members of the OPA Disability Access Survey Technical Work Group

Participants included representatives from disability consumer advocacy organizations and health plans:

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Presentation and Interpretation of Data

When interpreting the findings it is important to remember that the results are based on the sample of health plans that choose to respond to the survey. In addition, because of concerns over question design, some plans did not complete the survey. Because of the low response rate, it is difficult to evaluate the degree to which California Health Plans as a whole provide disability accessible services. Throughout the tables:

- NR denotes instances where a plan or plans did not respond to a survey question. An asterisk (*) also denotes the part of the question a plan or plans did not respond to a survey question.
- NA indicates when plans do not serve a particular line of business
- Averages are provided across health plan product lines for questions that complete responses were obtained.

These averages are shown both by the numeric value and the percentages by calculating the total number of responses for a given question and dividing it by four for the total possible product lines.

For example: Question 4:

Does the Plan have a specific individual, department, interdepartmental team, or program charged with the responsibility for the development and oversight of services for people with disabilities?

Question 4: Table 1: All Responses

Total Responses (N= 10)	Medi-Cal	HEALTHY FAMILIES	MEDICARE	COMMERCIAL	Average	
Yes	7 (70%)	7 (70%)	6 (60%)	5 (50%)	6.25 (62.5%)	
No	1 (10%)	1 (10%)	0 (0%)	1 (10%)	.33 (7.5%)	
N/A (Does not offer this line of business)	2 (20%)	2 (20%)	4 (40%)	4 (40%)	3.0 (30%)	
No Response	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	

Add:

Seven (7) Plans that offer Medi-Cal products + Seven (7) that offer Healthy Families products + Six (6) that offer Medicare products + Five (5) that offer a Commercial product which equals:

A total of 25 responses divided by 4 possible product lines which is equal to 6.25 or Over sixty-two percent (62%) of all Plans across all product lines have a specific individual, department, interdepartmental team, or program charged with the responsibility for the development and oversight of services for people with disabilities.

Analysis provided across product lines is provided for summary purposes only and should not be interpreted as the degree to which California health plan services are accessible for people with disabilities.

Summary of Results

Identification of Member Needs (Questions 4-8)

A critical component of promoting access to health care services is informing individuals that they have the right to request disability-related accommodations and that health care entities have procedures to follow-up on those requests. Questions asked about Plans' policies, procedures, and training to provide that information and establish those processes. Some of the results included:

- Over sixty-two percent (62%) of all responding Plans across all product lines have a specific individual, department, interdepartmental team, or program to develop and oversee services for people with disabilities.
- Over seventy percent (70%) of all responding Plans across all product lines have a process to inform members with disabilities of their right to disability accommodations.
- Sixty-five percent (65%) of all responding Plans across all product lines provide training to Plan Member Services Staff regarding members' right to request disability accommodations.
- Over forty-seven percent (47%) of all responding Plans across all product lines provide training to providers and office staff regarding the members' right to request disability accommodations.
- Over forty-seven percent (47%) of all responding Plans across all product lines have a process to track disability accommodations requests.

Disability Access Training (Questions 9-10)

In order to ensure access to health care for people with disabilities, it is important to promote appropriately accommodating and culturally competent services. For example, people with disabilities may require assistance from provider staff. But staff may not know that an individual has the right to request assistance or how to assist a person with a disability. This can cause frustration for both the person with a disability and the staff member. Questions inquiring about Plan staff and provider training sought information about:

- Various types of disabilities and chronic conditions
- Legal requirements presented in the Americans with Disabilities Act
- Definitions and concepts such as alternative formats, disability accommodations, medical equipment barriers, physical access barriers.

Some of the results from these questions included:

- Over fifty-seven percent (57%) of all responding Plans across all product lines have Disability Access Training for their Plan Member Services Staff.
- Over thirty-six percent (36%) of all responding Plans across all product lines have Disability Access Training for providers and their office staff.



Promoting Physical Access to Provider Offices (Questions 11-13)

Many people with disabilities do not obtain quality health care because of the lack of accessible health care facilities and/or medical equipment. As a result, some people with disabilities make primary and preventive health care services low priorities and pursue medical attention only for emergency or acute conditions. In addition, the lack of appropriate medical equipment can cause doctors to forgo procedures for people with disabilities they would ordinarily provide to other patients. Improving accessibility at health care facilities will encourage more individuals with disabilities to seek services, thus improving their general health. Questions in this section focused on Plans' policies, procedures, and training to assess providers' offices for physical access barriers including:

- Parking lots
- Path-of-travel into facility from parking lot and throughout facility
- Doors
- Exam and waiting rooms
- Medical Equipment (e.g. lift equipment, adjustable high/low exam tables, and wheelchair scales).

These questions were not intended to measure the level of accessibility of all responding Plans' contracted providers. The goal was to determine if health plans made efforts to document the accessibility of providers' facilities and to share that information with health plan members. Some of the results include:

One-hundred percent (100%) of all responding Plans across all product lines have policies and procedures to perform a facility site review of contracted health care providers' offices for physical access barriers including:

- Parking lots
- Path-of-travel into facility from parking lot and throughout facility
- Doors
- Exam and waiting rooms
- Restrooms
- Over eighty percent (80%) of all responding Plans have policies and procedures to perform a facility site review of contracted health care providers' offices for medical equipment.
- Fifty-eight percent (58%) of all responding Plans across all product lines reported that Member Services or another department can provide upon request information on health care providers with accessible facilities.
- Only one (1) Plan reported having a Provider Directory that includes information on contracted providers with accessible facilities.

Non-Emergency Medical Transportation (Question 14-16)

The survey included questions regarding coverage and processes for requesting non-emergency transportation because transportation directly impacts whether or not people with disabilities can access care. Non-emergency medical transportation is needed when personal or public transportation is not available or when accessing available transportation is medically contraindicated. Even when public transportation is available through fixed-route public transit or paratransit, riders frequently experience delays, resulting in missed appointments. These reduce access to routine care and increase the rate of ER usage and hospitalization. Some of the results include:

 One hundred percent (100%) of all responding Plans that offer Medi-Cal and Medicare product lines provide non-emergency medical transportation as a covered benefit. They also have a process for members to request non-emergency medical transportation, including wheelchairaccessible van services.

Access to Health Plan Information (Questions 17-27)

The ADA's effective communication provision mandates covered entities to provide materials in alternative formats. These mandates require health care providers and health plans to communicate effectively with individuals who are deaf, hard-of-hearing, or have a speech, vision, or learning disability. Among other things, communication access involves providing content through means that are usable and understandable by individuals unable to use standard print materials because they cannot read, manipulate, or process print due to a visual, physical, or learning disability. Materials are provided in:

- Large print (14 point font or larger).
- Braille
- Audio formats (cassette, CD)
- Electronic formats (computer diskette, CD-ROM)

The goal is similar to that of services provided to people with limited English proficiency: to provide people with disabilities with easily understood, accurate health plan information in a manner equal to and as effective as information provided to other members. Some of the results from these questions include:

- One-hundred percent (100%) of all responding Plans have policies and procedures for the production of materials in large print.
- Thirty-eight percent (38%) of all responding Plans provide information and/or written materials
 to health care providers and their staff on how members can request Plan materials in alternative
 formats
- Fifty-one percent (51%) of all responding Plans across all product lines provide disability access training to Member Service staff on how members can request Plan materials in alternative formats.
- One hundred percent (100%) of all responding Plans can mail materials in large print, Braille, and audiocassettes or CDs within 10 business days.
- One hundred percent (100%) of all responding Plans offer Provider Directories in large print and electronic formats on request.
- One hundred percent (100%) of all responding Plans with Medi-Cal and Healthy Families products offer their Member Handbooks/Evidence of Coverage (EOC)s in large print on request.



- One hundred percent (100%) of all responding Plans across all product lines offer their Member Handbooks/Evidence of Coverage (EOC)s in electronic format on request.
- One hundred percent (100%) of all responding Plans offer newsletters in large print and electronic formats on request.
- One hundred percent (100%) of all responding Plans offer grievance materials in large print and electronic formats on request.
- One hundred percent (100%) of all responding Plans that offer Medicare and Commercial product lines offer health education and preventive health materials in large print and electronic formats on request.

Question 27 Website Access

Websites should be accessible for all users, including people with disabilities who use a variety of assistive and adaptive software and alternative input devices to interact with their computers.

Many blind and visually impaired users employ screen reader software that reads the content of a page to the users. People with hearing impairments rely on captioning as an alternate to audio content. Those with dexterity impairments will employ a variety of adaptive keyboards and input devices.

The world wide web consortium (http://www.w3.org/) established the web accessibility initiative (http://www.w3.org/WAI/) to provide standards for accessible website design. Section 508 of the assistive technology act builds upon those standards for websites and electronic business conducted on government websites. Many state and local governments have adopted the section 508 standards for their sites and those of organizations, agencies and companies that do business with them.

The following were items discussed in the survey in an effort to determine the accessibility of health plans' websites including:

- Frames: Use the no frames element and meaningful titles; *Tables*: Make line-by-line reading sensible, etc.
- Complex graphics that convey important information (charts, graphs, illustrations) should be linked to detail descriptions that provide the same information for blind users.
- Audio/video content should be open captioned for hearing impaired users
- All non text elements should have alt tags providing description of the graphic's content or purpose
- Scripts, applets, & plug-ins: Provide alternative content in case active features are inaccessible or unsupported
- Images & animations: Use the alt tags to describe the function of each visual.
- Image maps: Use the client-side map and text for hotspots.

Additional items to consider where evaluating the accessibility of websites include:

- Text and background colors should provide good contract for people with low visions.
- Fonts should be easy to read, san-serif are preferable
- All pages should have a skip navigation link to enable blind users with screen readers to go



directly to the body text on every page.

It is difficult to interpret the results of this question because limitations in the online survey did not allow plans to indicate that they did not have a particular feature on their website. The results only indicate the number Plans that reported they were in compliance with a particular area but does not necessarily reflect the accessibility of a Plan's websites.

Images & Animations

- Six (6) Plans offering a Medi-Cal product.
- Six (6) Plans offering a **Healthy Families** product.
- Four (4) Plans offering a **Medicare** product.
- Four (4) Plans offering a **Commercial** product

Image Maps

- Six (6) Plans offering a **Medi-Cal** product.
- Six (6) Plans offering a **Healthy Families** product.
- Four (4) Plans offering a **Medicare** product.
- Four (4) Plans offering a Commercial product

Multimedia

- Three (3) Plans offering a **Medi-Cal** product.
- Three (3) Plans offering a **Healthy Families** product.
- Three (3) Plans offering a **Medicare** product.
- Three (3) Plans offering a **Commercial** product

Graphs & Charts

- Four (4) Plans offering a **Medi-Cal** product.
- Four (4) Plans offering a **Healthy Families** product.
- Four (4) Plans offering a **Medicare** product.
- Four (4) Plans offering a **Commercial** product

Tables

- Seven (7) Plans offering a **Medi-Cal** product.
- Seven (7) Plans offering a **Healthy Families** product.
- Five (5) Plans offering a Medicare product.
- Five (5) Plans offering a **Commercial** product



Scripts, Applets & Plug-ins

- Two (2) Plans offering a **Medi-Cal** product.
- Two (2) Plans offering a **Healthy Families** product.
- Two (2) Plans offering a **Medicare** product.
- Three (3) Plans offering a **Commercial** product

Frames

- Two (3) Plans offering a **Medi-Cal** product.
- Two (3) Plans offering a **Healthy Families** product.
- Four (4) Plans offering a **Medicare** product.
- Four (4) Plans offering a **Commercial** product



Findings

Total Responses

Of the twenty-eight (28) health plans asked to participate in the project, only ten (10) submitted surveys, a response rate of thirty-six percent (36%).

In addition, because of concerns over question design, some plans did not complete the survey. Because of the low response rate, it is difficult to evaluate the degree to which California Health Plans as a whole provide disability accessible services.

	Plans Submitted Response
TOTALS	10
Percent	36%

Follow-up contacts sought to determine why most plans did not respond to the survey. Of the eighteen (18) plans that had not responded to the survey, eight (8) gave specific reasons:

- One (1) indicated that key Plan individuals responsible for filling-out the survey were on medical leave.
- Two (2) Plans were applying for special needs plans as part of Medicare Part D applications and indicated they did not have the staff resources to complete the survey.
- One (1) Plan indicated their resources would be better used elsewhere given the Plan's size in the California market.
- Despite OPA's assurance that it would not publicly report individual Plan responses, one (1) Plan cited concern over how the data would be used.
- Three (3) Plans were in the process of evaluating the accessibility of their services and did not feel it was appropriate for them to participate in the survey. In relation to this issue, one (1) of those plans had concerns that the yes/no question format did not reflect the process plans undertake to serve the senior and disabled population better. The Plan suggested a graduated answer format such as:
 - o We are considering
 - o We are in the process of implementing
 - o We have in place
 - o Not applicable

One (1) of these Plans also had additional concerns about potential ADA lawsuits as a result of responding to the survey.

Plan's Line of Business

Total Responses (N= 10)	Medi-Cal	Healthy Families	Medicare	Commercial
Total by Line of Business	8	8	6	6
Percent	80%	80%	60%	60%

Of the plans that responded:

- Eight (8) or eighty percent offered services to **Medi-Cal** members,
- Eight (8) or eighty percent offered services to **Healthy Families** members,
- Six (6) or sixty percent offered services to **Medicare** members and,
- Six (6) or sixty percent provided services to **Commercial** members.



Identification of Member Needs

Question 4

Does the Plan have a specific individual, department, interdepartmental team, or program charged with the responsibility for the development and oversight of services for people with disabilities?

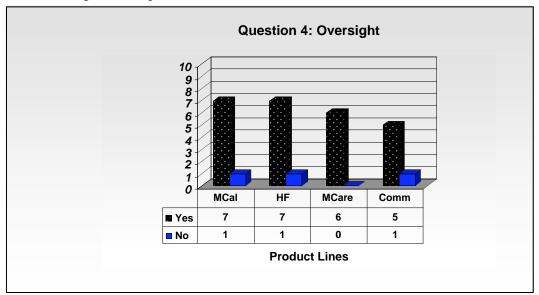
Question 4: Table 1: All Responses

Total Responses (N= 10)	MEDI-CAL	HEALTHY FAMILIES	MEDICARE	COMMERCIAL	AVERAGE
Yes	7 (70%)	7 (70%)	6 (60%)	5 (50%)	6.25 (62.5%)
No	1 (10%)	1 (10%)	0 (0%)	1 (10%)	.33 (7.5%)
N/A (Does not offer this line of business)	2 (20%)	2 (20%)	4 (40%)	4 (40%)	3.0 (30%)
No Response	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)

Over sixty-two percent (62%) of all Plans across all product lines have a specific individual, department, interdepartmental team, or program charged with the responsibility for the development and oversight of services for people with disabilities.



Question 4: Figure 1: Responses with Product Lines



Question 4, Figure 1 includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not they have a specific individual, department, interdepartmental team, or program charged with the responsibility for the development and oversight of services for people with disabilities. Plans having such a service include:

- Seven (7) out of eight (8) or over eighty-seven percent (87.5%) of all responding Plans offering a **Medi-Cal** product.
- Seven (7) out of eight (8) or over eighty-seven percent (87.5%) of all responding Plans offering a **Healthy Families** product.
- Six (6) out of six (6) or one-hundred (100%) of all responding Plans offering a Medicare product.
- Five (5) out of six (6) or eighty-three (83%) of all responding Plans offering a Commercial product.

Comments from plans:

- The QI/UM Program is designed to objectively monitor, systematically evaluate, and effectively
 improve the quality and safety of clinical care and quality of service provided to members (i.e.,
 Disease Management & Case Management Programs, Health Improvement, Caregiver, Customer
 Service).
- 2. We have an interdepartmental team that is responsible for system development and oversight of services for seniors and persons with disabilities.

Question 5

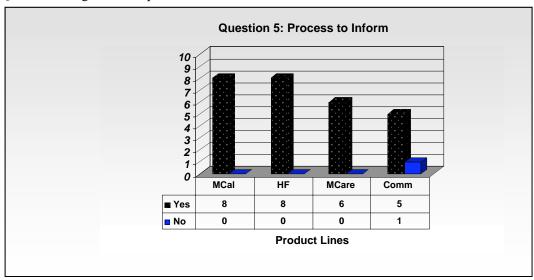
Does the Plan have a process to inform members with disabilities of their right to receive disability accommodations?

Question 5: Table 1: All Responses

Total Responses (N= 10)	Medi-Cal	HEALTHY FAMILIES	Medicare	COMMERCIAL	Average
Yes	8 (80%)	8 (80%)	6 (60%)	5 (50%)	7.00 (70%)
No	0 (0%)	0 (0%)	0 (0%)	1 (10%)	0.25 (0%)
N/A (Not Offered)	2 (20%)	2 (20%)	4 (40%)	4 (40%)	3.0(30%)
No Response	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)

Over seventy percent (70%) of all Plans across all product lines have a process to inform members with disabilities of their right to receive disability accommodations.

Question 5: Figure 1: Responses with Product Lines



Question 5, Figure 1 includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not they have a process to inform members with disabilities of their right to receive disability accommodations. Plans having such a process include:

- Eight (8) out of eight (8) or one-hundred percent (100%) of all responding Plans offering a Medi-Cal product.
- Eight (8) out of eight (8) or one-hundred percent (100%) of all responding Plans offering a **Healthy** Families product.
- Six (6) out of six (6) or one-hundred percent (100%) of all responding Plans offering a Medicare product.
- Five (5) out of six (6) or eighty-three (83%) of all responding Plans offering a Commercial product.



Comments from plans:

- 1. Member newsletter and EOC in upcoming distribution.
- 2. Members are provided information about their right to receive disability accommodations from their program specific/ line of business Evidence of Coverage. The EOC is unique to each line of business and some also vary by account and service area.



Question 6

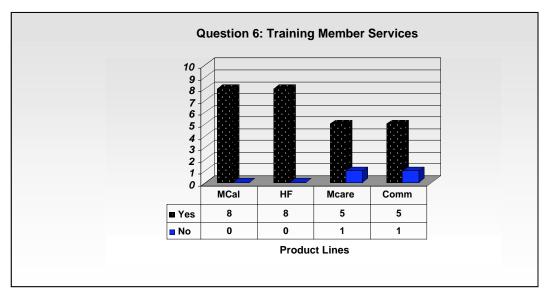
Does the Plan provide training to Plan Member Services Staff as to the rights of members to request disability accommodations?

Question 6: Table 1: All Responses

Total Responses (N= 10)	Medi-Cal	HEALTHY FAMILIES	Medicare	COMMERCIAL	Average
Yes	8 (80%)	8 (80%)	5 (50%)	5 (50%)	6.50 (65.0%)
No	0 (0%)	0 (0%)	1 (10%)	1 (10%)	.50 (5%)
N/A (Not Offered)	2 (20%)	2 (20%)	4 (40%)	4 (40%)	3.0 (30%)
No Response	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)

Sixty-five percent (65%) of all responding Plans across all product lines provide training to Plan Member Services Staff as to the rights of members to request disability accommodations.

Question 6: Figure 1: Responses with Product Lines



Question 6, Figure 1 includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not they offer training to Plan Member Services Staff as to the rights of members to request disability accommodations. Plans that provide training include:

- Eight (8) out of eight (8) or one-hundred percent (100%) of all responding Plans offering a Medi-Cal product.
- Eight (8) out of eight (8) or one-hundred percent (100%) of all responding Plans offering a **Healthy** Families product.
- Five (5) out of six (6) or eighty-three percent (83%) of all responding Plans offering a Medicare product.
- Five (5) out of six (6) or eighty-three percent (83%) of all responding Plans offering a Commercial product.



Question 7

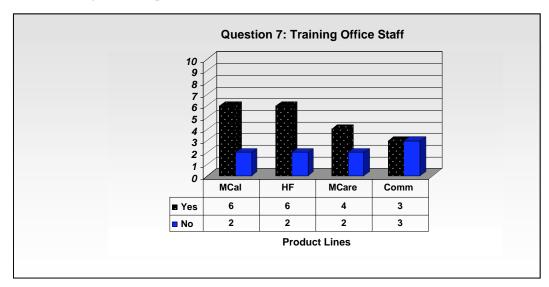
Does the Plan provide training to providers and office staff as to the rights of members to request disability accommodations?

Question 7: Table 1: All Responses

Total Responses (N= 10)	Medi-Cal	HEALTHY FAMILIES	Medicare	COMMERCIAL	Average
Yes	6 (60%)	6 (60%)	4 (40%)	3 (30%)	4.75 (47.5%)
No	2 (20%)	2 (20%)	2 (20%)	3 (30%)	2.25 (22.5%)
N/A (Not Offered)	t Offered) 2 (20%)		4 (40%)	4 (40%)	3 (30%)
No Response	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)

Over forty-seven percent (47%) of all responding Plans across all product lines provide training to providers and office staff as to the rights of members to request disability accommodations.

Question 7: Figure 1: Responses with Product Lines



Question 7, Figure 1 includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not they offer training to providers and office Staff as to the rights of members to request disability accommodations. Plans that provide training include:

- Six (6) out of eight (8) or seventy-five percent (75%) of all responding Plans offering a Medi-Cal product.
- Six (6) out of eight (8) or seventy-five percent (75%) of all responding Plans offering a **Healthy Families** product.
- Four (4) out of six (6) or sixty-six percent (66%) of all responding Plans offering a Medicare product.
- Three (3) out of six (6) or fifty percent (50%) of all responding Plans offering a Commercial product.

Comments from plans:

- 1. No formal training now but in the plans for 2006-2007 based on Facility Site Review (FSR) results.
- 2. The plan trains its providers on the rights of members to request disability accommodations from the plan such as, a member's right to ask for the plan's materials in alternate formats (e.g., larger size print and Braille) and to receive interpreter services. The plan also requires its providers to post the member's rights and responsibilities in the provider's office. The plan trains its providers on the benefits offered by the plan such as, non-emergency medical transportation, and Molina makes the DHS Site Review tool, which includes a check-list of DHS designated physical access barriers, available to its primary care providers. However, as a health plan, we are not in a position to train, provide legal advice or replace a provider's own legal counsel's recommendations as to how best to meet the health care provider's own responsibilities under ADA as a public accommodation responsible for deciding how to provide reasonable accommodations to persons with disabilities.
- 3. Providers and their staff are provided information about the rights of members to request disability accommodations in the Plan's Provider Manuals which are available online. Provider update notices are mailed directly to providers as program changes warrant.



Question 8

Does the Plan have a process to track the disability accommodations requested by members with disabilities?

Question 8: Table 1: All Responses

Total Responses (N= 10)	Medi-Cal	HEALTHY FAMILIES	MEDICARE	COMMERCIAL	Average	
Yes	6 (60%)	6 (60%)	4 (40%)	3 (30%)	4.75 (47.5%)	
No	2 (20%)	2 (20%)	2 (20%)	3 (30%)	2.25 (22.5%)	
N/A (Not Offered)	2 (20%)	2 (20%)	4 (40%)	4 (40%)	3 (30%)	
No Response	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	

Over forty-seven percent (47%) of all responding Plans across all product lines have a process to track the disability accommodations requested by members with disabilities.

Question 8: Process to Track 10 9 8 7 6 5 4 3 2 0 Mcal HF Mcare Comm 6 6 4 3 ■ Yes ■ No 2 **Product Lines**

Question 8: Figure 1: Responses with Product Lines

Question 8, Figure 1 includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not they have a process to track the disability accommodations requested by members with disabilities. Plans that have a process include:

- Six (6) out of eight (8) or seventy-five percent (75%) of all responding Plans offering a **Medi-Cal** product.
- Six (6) out of eight (8) or seventy-five percent (75%) of all responding Plans offering a **Healthy Families** product.
- Four (4) out of six (6) or sixty-six percent (66%) of all responding Plans offering a Medicare product.
- Three (3) out of six (6) or fifty percent (50%) of all responding Plans offering a Commercial product.

Comments from plans:

- 1. This is currently in development through work with Member Services and Facility Site Review.
- 2. A member's disability accommodations request can be tracked by the Member Service staff through review of the member information data systems' notes and through the medical management systems.
- 3. We can track need for sign language interpreters, but not for physical accommodations



Disability Access Training

Question 9

Does the Plan provide Disability Access Training designed to further the understanding of the needs of people with disabilities to Plan Member Services Staff which includes?

- · Information on various types of chronic conditions and disabilities
- Legal requirements presented in The Americans with Disabilities Act (ADA)
- Definitions and concepts such as alternative formats, disability accommodations, medical equipment barriers, physical access barriers

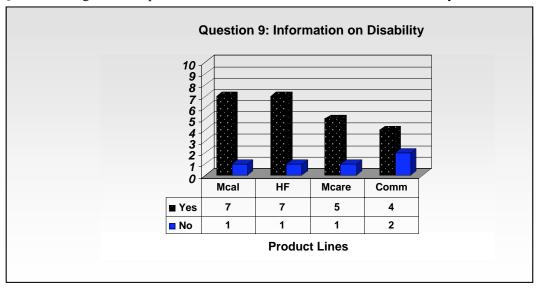
Question 9: Figure 1: All Responses

Total Responses (N= 10)	Medi-Cal			HEALTHY FAMILIES			Medicare			COMMERCIAL		
	Yes	No	N/A	Yes	No	N/A	Yes	No	N/A	Yes	No	N/A
Information on various types	7	1	2	7	1	2	5	1	4	4	2	4
of chronic conditions and disabilities	70%	10%	20%	70%	10%	20%	50%	10%	40%	40%	20%	40%
Legal requirements	7	1	2	7	1	2	5	1	4	4	2	4
presented in The Americans with Disabilities Act (ADA)	70%	10%	20%	70%	10%	20%	50%	10%	40%	40%	20%	40%
Definitions and concepts such as alternative formats,	7	1	2	7	1	2	5	1	4	4	2	4
disability accommodations, medical equipment barriers, physical access barriers	70%	10%	20%	70%	10%	20%	50%	10%	40%	40%	20%	40%
Average	7	1	2	7	1	2	5	1	4	4	2	4
AVERAGE	70%	10%	20%	70%	10%	20%	50%	10%	40%	40%	20%	40%
				A VER	GE SU	MMARY						
			Plans th	nat Offer	Trainin	g – 5.75	(57.5%)					
		Pla	ns that	don't O	ffer Tra	ning - 1.	25 (12.5	%)				
				N	A 3 (309	%)						
				No Re	sponse	0 (0%)						

Over fifty-seven percent (57%) of all responding Plans across all product lines have Disability Access Training designed to further the understanding of the needs of people with disabilities to Plan Member Services Staff.

Information on Various Types of Chronic Conditions and Disabilities

Question 9: Figure 1: Responses with Product Lines, Information on Disability



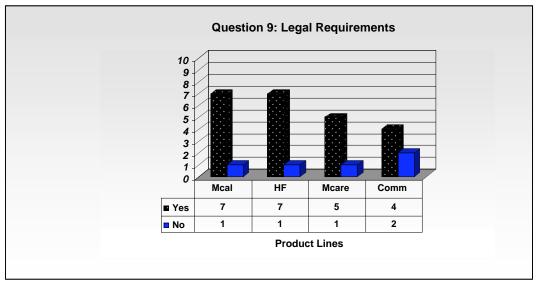
Question 9, Figure 1, Information on Disability includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not they provide training to plan Member Service Staff on information on various types of chronic conditions and disabilities. Plans that provide training include:

- Seven (7) out of eight (8) or over eighty-seven percent (87.5%) of all responding Plans offering a **Medi-Cal** product.
- Seven (7) out of eight (8) or over eighty-seven percent (87.5%) of all responding Plans offering a **Healthy Families** product.
- Five (5) out of six (6) or eighty-three percent (83%) of all responding Plans offering a Medicare product.
- Four (4) out of six (6) or sixty-six percent (66%) of all responding Plans offering a Commercial product.



Legal Requirements Presented in the Americans with Disabilities Act (ADA)

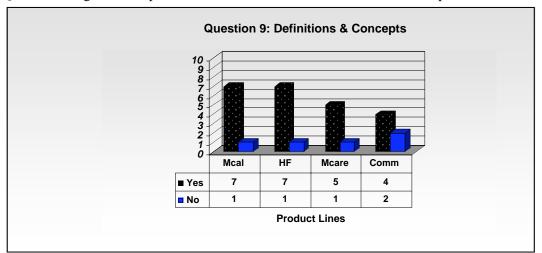
Question 9: Figure 2: Responses with Product Lines, Legal Requirements



Question 9, Figure 2, Legal Requirements includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not they provide training to plan Member Service Staff on legal requirements presented in the Americans with Disabilities Act (ADA). Plans that provide training include:

- Seven (7) out of eight (8) or over eighty-seven percent (87.5%) of all responding Plans offering a **Medi-Cal** product.
- Seven (7) out of eight (8) or over eighty-seven percent (87.5%) of all responding Plans offering a **Healthy Families** product.
- Five (5) out of six (6) or eighty-three percent (83%) of all responding Plans offering a Medicare product.
- Four (4) out of six (6) or sixty-six percent (66%) of all responding Plans offering a Commercial product.

<u>Definitions and Concepts Such as Alternative Formats, Disability Accommodations, Medical Equipment Barriers, Physical Access Barriers</u>



Question 9: Figure 3: Responses with Product Lines, Definitions and Concepts

Question 9, Figure 3, Definitions & Concepts includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not they provide training to plan Member Service Staff on definitions and concepts such as alternative formats, disability accommodations, medical equipment barriers, physical access barriers. Plans that provide training include:

- Seven (7) out of eight (8) or over eighty-seven percent (87.5%) of all responding Plans offering a **Medi-Cal** product.
- Seven (7) out of eight (8) or over eighty-seven percent (87.5%) of all responding Plans offering a **Healthy Families** product.
- Five (5) out of six (6) or eighty-three percent (83%) of all responding Plans offering a **Medicare** product.
- Four (4) out of six (6) or sixty-six percent (66%) of all responding Plans offering a Commercial product.



Question 10

Does the Plan provide Disability Access Training designed to further the understanding of the needs of people with disabilities for office staff / providers which includes?

- · Information on various types of chronic conditions and disabilities
- Legal requirements presented in The Americans with Disabilities Act (ADA)
- Definitions and concepts such as alternative formats, disability accommodations, medical equipment barriers, physical access barriers.

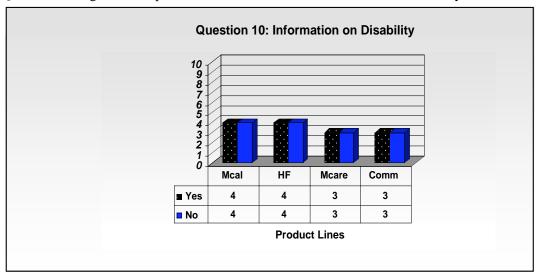
Question 10: Table 1: All Responses

Total Responses	Medi-Cal			HEALTHY FAMILIES			MEDICARE			COMMERCIAL			
(N= 10)	Yes	No	N/A	Yes	No	N/A	Yes	No	N/A	Yes	No	N/A	
Information on various types of chronic conditions and	4	4	2	4	4	2	3	3	4	3	3	4	
disabilities;	40%	40%	20%	40%	40%	20%	30%	30%	40%	30%	30%	40%	
Legal requirements presented in The Americans	4	4	2	4	4	2	4	2	4	4	2	4	
_with Disabilities Act (ADA)	40%	40%	20%	40%	40%	20%	40%	20%	40%	40%	20%	40%	
Definitions and concepts such as alternative formats, disability accommodations,	4	4	2	4	4	2	3	3	4	3	3	4	
medical equipment barriers, physical access barriers	40%	40%	20%	40%	40%	20%	30%	30%	40%	30%	30%	40%	
Average	4	4	2	4	4	2	3.33	2.66	4	3.33	2.66	4	
AVERAGE	40%	40%	20%	40%	40%	20%	33.3%	26.6%	40%	33.3%	26.6%	40%	
				Aver	RAGE S	UMMARY	1						
	Plans that Offer Training – 3.65 (36%)												
	Plans that Don't Offer Training 3.33 (33%)												
_					NA 3.0 (30%)							
				No F	Respons	se 0 (0%)							

Over thirty-six percent (36%) of all responding Plans across all product lines reported having Disability Access Training designed to further the understanding of the needs of people with disabilities for office staff / provide.

Information on Various Types of Chronic Conditions and Disabilities

Question 10: Figure 1: Responses with Product Lines, Information on Disability



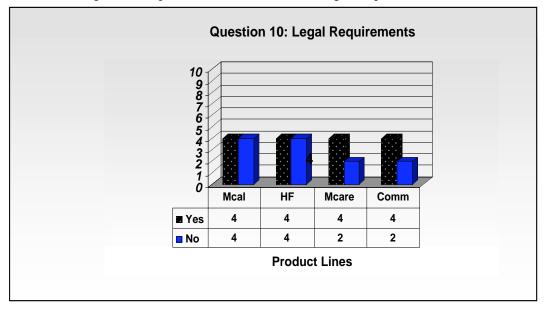
Question 10, Figure 1, Information on Disability includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not they provide training to office staff / providers on information on various types of chronic conditions and disabilities. Plans that provide training include:

- Four (4) out of eight (8) or fifty percent (50%) of all responding Plans offering a Medi-Cal product.
- Four (4) out of eight (8) or fifty percent (50%) of all responding Plans offering a **Healthy Families** product.
- Three (3) out of six (6) or fifty percent (50%) of all responding Plans offering a **Medicare** product.
- Three (3) out of six (6) or fifty percent (50%) of all responding Plans offering a Commercial products



Legal Requirements Presented in the Americans with Disabilities Act (ADA)

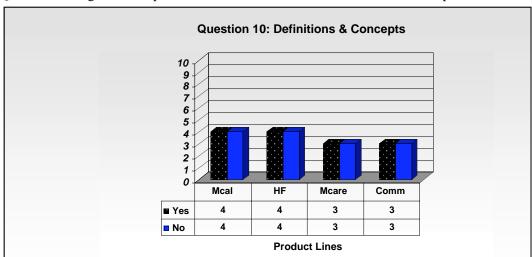
Question 10: Figure 2: Responses with Product Lines, Legal Requirements



Question 10, Figure 2, Legal Requirements includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not they provide training to office staff / providers on legal requirements presented in the Americans with Disabilities Act (ADA). Plans that provide training include:

- Four (4) out of eight (8) or fifty percent (50%) of all responding Plans offering a Medi-Cal product.
- Four (4) out of eight (8) or fifty percent (50%) of all responding Plans offering a **Healthy Families** product.
- Four (4) out of six (6) or sixty-six percent (66%) of all responding Plans offering a Medicare product.
- Four (4) out of six (6) or sixty-six percent (66%) of all responding Plans offering a Commercial product.

<u>Definitions and Concepts Such as Alternative Formats, Disability Accommodations, Medical Equipment Barriers, Physical Access Barriers</u>



Question 10: Figure 3: Responses with Product Lines, Definitions and Concepts

Question 10, Figure 3, Definitions & Concepts includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not they provide training to office staff / providers on definitions and concepts such as alternative formats, disability accommodations, medical equipment barriers, physical access barriers. Plans that provide training include:

- Four (4) out of eight (8) or fifty percent (50%) of all responding Plans offering a Medi-Cal product.
- Four (4) out of eight (8) or fifty percent (50%) of all responding Plans offering a **Healthy Families** product.
- Three (3) out of six (6) or fifty percent (50%) of all responding Plans offering a **Medicare** product.
- Three (3) out of six (6) or fifty percent (50%) of all responding Plans offering a Commercial product.

Comments from plans:

- 1. Information is provided but not specific training.
- 2. Providers are responsible for training staff, not plan.
- 3. The Plan contracts with its providers require compliance with The Americans with Disabilities Act (ADA), and the ADA places the burden directly upon health care providers, as public accommodations, to decide how to make reasonable accommodations to persons with disabilities.
- 4. As a health plan, we are not in a position to provide legal advice or replace a provider's own legal counsel's recommendations as to how best to meet the health care provider's responsibilities under ADA. However, the new Seniors and Persons with Disabilities Assessment Tool Addendum to the DHS site review process that we will soon be using, may act to educate the providers with regard to those items that DHS feels are important in treating persons with disabilities.
- 5. Two plans indicated they were in the planning stages of developing provider based training.

Physical Access Barriers

Question 11

Does the Plan have policies and procedures to perform a facility site review of contracted health care provider's offices for physical access barriers including the following?

- · Parking lot,
- Path-of-travel: into facility from parking lot & throughout facility
- Doors
- Exam and waiting rooms
- Medical Equipment (e.g. lift equipment, adjustable high/low exam tables & wheelchair scales).

Question 11: Table 1: All Responses, *1 Plan No Response= NR

Total	MEDI-CAL				HEALTHY FAMILIES				Medicare				COMMERCIAL			
Resp. (N= 9)	Yes	No	N/A	NR	Yes	No	N/A	NR	Yes	No	N/A	NR	Yes	No	N/A	NR
*1 NR																
*Parking lot	7	0	2	1	7	0	2	1	5	0	4	1	5	0	4	1
*Path-of- travel: into facility from parking lot &	70%	0	20%	10%	70%	0	20%	10%	50% 5	0	40%	10%	50%	0	40%	10%
throughout facility	70%	0	20%	10%	70%	0	20%	10%	50%	0	40%	10%	50%	0	40%	10%
*Doors	7 70%	0	20%	1 10%	7 70%	0	20%	1 10%	5 50%	0	4 40%	1 10%	5 50%	0	4 40%	1 10%
*Exam and waiting rooms	70%	0	20%	10%	70%	0	20%	10%	5	0	40%	10%	5	0	40%	10%
	70%	0	20%	10%	70%	0	20%	10%	50%	0	40%	10%	50%	0	40%	10%
*Restrooms	7	0	2	1	7	0	2	1	5	0	4	1	5	0	4	1
	70%	0	20%	10%	70%	0	20%	10%	50%	0	40%	10%	50%	0	40%	10%
*Medical Equipment (e.g lift equipment ,adjustable high/low	6	1	2	1	6	1	2	1	4	1	4	1	4	1	4	1
exam tables & wheelchair scales)	60%	10%	20%	10%	60%	10%	20%	10%	40%	10%	40%	10%	40%	10%	40%	10%

One plan did not complete the questions giving the following response:

Our facility site review process is the midst of a multi-phase implementation and the specifics of what is audited varies by geographic area based on stage of implementation.

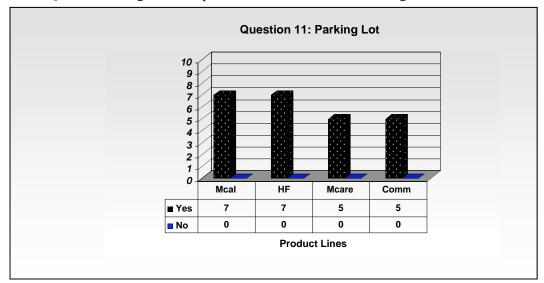
One-hundred percent (100%) across all product lines have policies and procedures to perform a facility site review of contracted health care provider's offices for physical access barriers for the:

33

- Parking lot,
- Path-of-travel: into facility from parking lot & throughout facility and
- Doors.
- Exam and waiting rooms
- Restrooms

Over eighty percent (80%) of all responding Plans have policies and procedures to perform a facility site review of contracted health care provider's offices for medical equipment.

Parking Lot



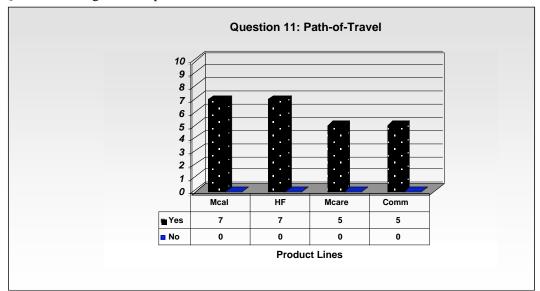
Question 11: Figure 1: Responses with Product Lines, Parking lot

Question 11, Figure 1, Parking Lot includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not they have policies and procedures to perform a facility site review of contracted health care provider's offices for physical access barriers including the parking lot. Plans that have policies include:

- Seven (7) out of seven (7) or one-hundred percent (100 %) of all responding Plans offering a Medi-Cal product.
- Seven (7) out of seven (7) or one-hundred percent (100%) of all responding Plans offering a **Healthy Families** product.
- Five (5) out of five (5) or one-hundred percent (100%) of all responding Plans offering a Medicare product.
- Five (5) out of five (5) or one-hundred percent (100%) of all responding Plans offering a Commercial product.



Path-of-Travel: Into Facility from Parking Lot & Throughout Facility

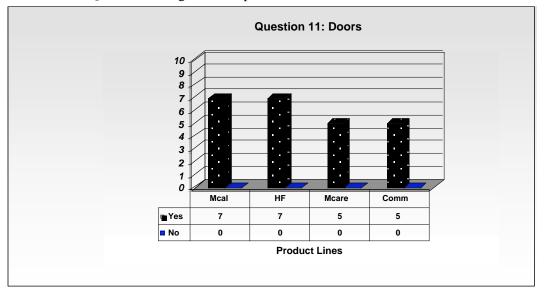


Question 11: Figure 2 Responses with Product Lines: Path-of-Travel

Question 11, Figure 2, Path-of-Travel includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not they have policies and procedures to perform a facility site review of contracted health care provider's offices for physical access barriers including the path-of-travel into the facility from the parking lot and throughout the facility. Plans that have policies include:

- Seven (7) out of seven (7) or one-hundred percent (100 %) of all responding Plans offering a Medi-Cal product.
- Seven (7) out of seven (7) or one-hundred percent (100%) of all responding Plans offering a **Healthy** Families product.
- Five (5) out of five (5) or one-hundred percent (100%) of all responding Plans offering a **Medicare** product.
- Five (5) out of five (5) or one-hundred percent (100%) of all responding Plans offering a Commercial product.

Doors



Question 11: Figure 3: Responses with Product Lines, Doors

Question11, Figure 3, Doors includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not they have policies and procedures to perform a facility site review of contracted health care provider's offices for physical access barriers including the doors. Plans that have policies include:

- Seven (7) out of seven (7) or one-hundred percent (100 %) of all responding Plans offering a Medi-Cal product.
- Seven (7) out of seven (7) or one-hundred percent (100%) of all responding Plans offering a **Healthy Families** product.
- Five (5) out of five (5) or one-hundred percent (100%) of all responding Plans offering a **Medicare** product.
- Five (5) out of five (5) or one-hundred percent (100%) of all responding Plans offering a Commercial product.



Exam and Waiting Rooms

Question 11: Exam & Waiting Rooms

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Question 11: Figure 4: Responses with Product Lines, Exam and Waiting Rooms

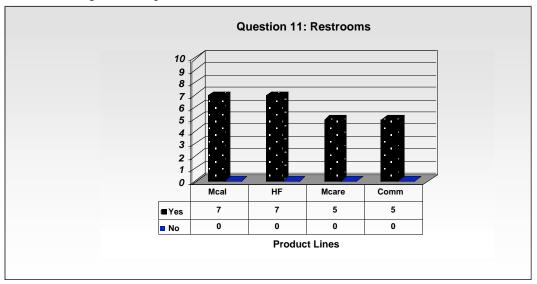
Question 11, Figure 4, Exam and Waiting Rooms includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not they have policies and procedures to perform a facility site review of contracted health care provider's offices for physical access barriers including the exam and waiting rooms. Plans that have policies include:

Product Lines

- Seven (7) out of seven (7) or one-hundred percent (100 %) of all responding Plans offering a Medi-Cal product.
- Seven (7) out of seven (7) or one-hundred percent (100%) of all responding Plans offering a **Healthy** Families product.
- Five (5) out of five (5) or one-hundred percent (100%) of all responding Plans offering a **Medicare** product.
- Five (5) out of five (5) or one-hundred percent (100%) of all responding Plans offering a Commercial product.

Restrooms

Question 11: Figure 5: Responses with Product Lines, Restrooms

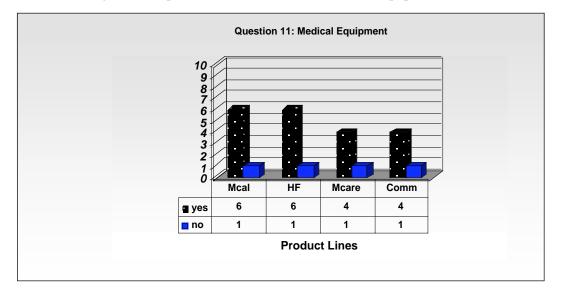


Question 11, Figure 5, Restrooms includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not they have policies and procedures to perform a facility site review of contracted health care provider's offices for physical access barriers including the restrooms rooms. Plans that have policies include:

- Seven (7) out of seven (7) or one-hundred percent (100 %) of all responding Plans offering a Medi-Cal product.
- Seven (7) out of seven (7) or one-hundred percent (100%) of all responding Plans offering a **Healthy Families** product.
- Five (5) out of five (5) or one-hundred percent (100%) of all responding Plans offering a **Medicare** product.
- Five (5) out of five (5) or one-hundred percent (100%) of all responding Plans offering a Commercial product.



Medical Equipment (E.G Lift Equipment, Adjustable High/Low Exam Tables & Wheelchair Scales)



Question 11: Figure 6: Responses with Product Lines, Medical Equipment

Question 11, Figure 6, Medical Equipment includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not they have policies and procedures to perform a facility site review of contracted health care provider's offices for physical access barriers including the restrooms rooms. Plans that have policies include:

- Six (6) out of seven (7) or over eighty-five percent (85.7 %) of all responding Plans offering a Medi-Cal product.
- Six (6) out of seven (7) or over eight-five percent (85.7%) of all responding Plans offering a **Healthy Families** product.
- Four (4) out of five (5) or eighty percent (80%) of all responding Plans offering a Medicare product.
- Four (4) out of five (5) or eighty percent (80%) of all responding Plans offering a Commercial product.

Comments from plans:

- 1. Site visit conducted for PCP,OB/GYN & high vol BH
- 2. The Plan currently uses the DHS Site Review tool to evaluate those DHS designated physical access barriers for primary care physician offices. To the extent that the ADA may require providers, as public accommodations to remove barriers, we contracts with its providers require compliance with the ADA, and the ADA places the burden directly upon health care providers to make reasonable accommodations to persons with disabilities. As a health plan, we cannot provide legal advice or replace a provider's own legal counsel's recommendations as to how best to meet the health care provider's responsibilities under ADA.

Question 12

Can the Plan Member Services staff or another department provide upon request information on health care providers with accessible facilities including the following?

- Parking lot,
- Path-of-travel: into facility from parking lot & throughout facility
- Doors
- Exam and waiting rooms
- Medical Equipment (e.g. lift equipment, adjustable high/low exam tables & wheelchair scales)

Question 12: Table1: All Responses

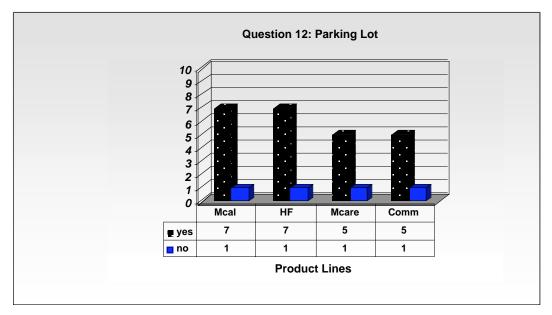
Total	MEDI-C	CAL			HEALTH	MEDIO	CARE			COMMERCIAL						
Resp. (N= 10)	Yes	No	N/A	N R	Yes	No	N/A	N R	Yes	No	N/A	NR	Yes	No	N/A	N R
Parking lot	7	1	2	0	7	1	2	0	5	1	4	0	5	1	4	0
Path-of-	70%	10%	20%	0	70%	10%	20%	0	50%	10%	40%	0	50%	10%	40%	0
travel: into facility from parking lot &	7	1	2	0	7	1	2	0	5	1	4	0	5	1	4	0
throughout facility	70%	10%	20%	0	70%	10%	20%	0	50%	10%	40%	0	50%	10%	40%	0
Doors	7	1	2	0	7	1	2	0	5	1	4	0	5	1	4	0
D0013	70%	10%	20%	0	70%	10%	20%	0	50%	10%	40%	0	50%	10%	40%	0
Exam and	7	1	2	0	7	1	2	0	5	1	4	0	5	1	4	0
waiting rooms	70%	10%	20%	0	70%	10%	20%	0	50%	10%	40%	0	50%	10%	40%	0
	7	1	2	0	7	1	2	0	5	1	4	0	5	1	4	0
Restrooms	70%	10%	20%	0	70%	10%	20%	0	50%	10%	40%	0	50%	10%	40%	0
Medical Equipment (e.g lift equipment ,adjustable	6	2	2	0	6	2	2	0	5	1	4	0	4	2	4	0
high/low exam tables & wheelchair scales)	60%	20%	20%	0	60%	20%	20%	0	50%	10%	40%	0	40%	20%	40%	0
AVEDAGE	6.83	1.17	2	0	6.83	1.17	2	0	5	1	4	0	4.83	1.16	4	0
AVERAGE	68.3%	11.7%	20%	0	68.3%	11.7%	20%	0	50%	10%	40%	0	48%	12%	40%	0
					DI	SUMMA				0/)						
						hat offer I			•							
					Plans tha	nt don't of			11.39 (14%)						
							A 3 (30%									
						No Res	sponse	0 (0%))							

Fifty-eight percent (58%) of all responding Plans across all product lines reported having the ability for Member Services or another department provide upon request information on health care providers with accessible facilities.



Parking lot

Question 12: Figure 1: Responses with Product Lines, Parking lot

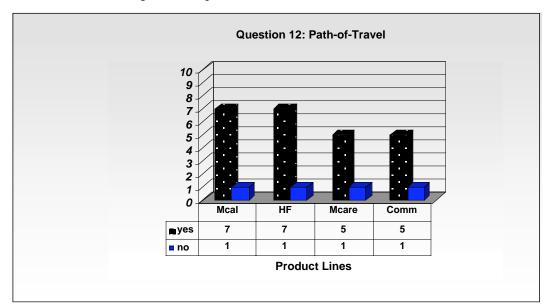


Question 12, Figure 1, Parking lot, includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not their Plan Member Services staff or another department can provide upon request information on health care providers with accessible facilities including the parking lot. Plans that have staff that can provide this information upon request include:

- Seven (7) out of eight (8) or over eighty-seven percent (87.5 %) of all responding Plans offering a Medi-Cal product.
- Seven (7) out of eight (8) or over eighty-seven percent (87.5 %) of all responding Plans offering a **Healthy Families** product.
- Five (5) out of six (6) or eighty-three percent (83%) of all responding Plans offering a Medicare product.
- Five (5) out of six (6) or eighty-three percent (83%) of all responding Plans offering a Commercial product.

Path-Of-Travel:

Into The Facility From The Parking Lot & Throughout The Facility



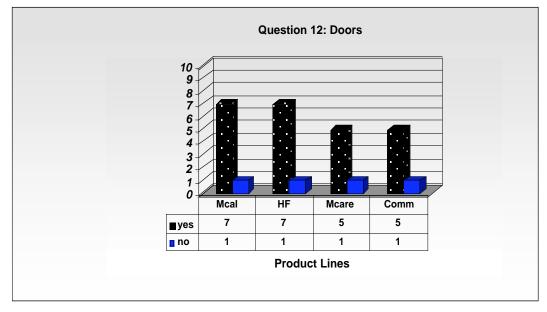
Question 12: Figure 2: Responses with Product Lines, Path-of-Travel

Question 12, Figure 2, Path-of-Travel includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not their Plan Member Services staff or another department can provide upon request information on health care providers with accessible facilities including the path-of-travel into the facility from the parking lot and throughout the facility. Plans that have staff that can provide this information upon request include:

- Seven (7) out of eight (8) or over eighty-seven percent (87.5 %) of all responding Plans offering a Medi-Cal product.
- Seven (7) out of eight (8) or over eighty-seven percent (87.5 %) of all responding Plans offering a **Healthy Families** product.
- Five (5) out of six (6), or eighty-three percent (83%) of all responding Plans offering a Medicare product and,
- Five (5) out of six (6), or eighty-three percent (83%) of all responding Plans offering a Commercial product.

Doors

Question 12: Figure 3: Responses with Product Lines, Doors

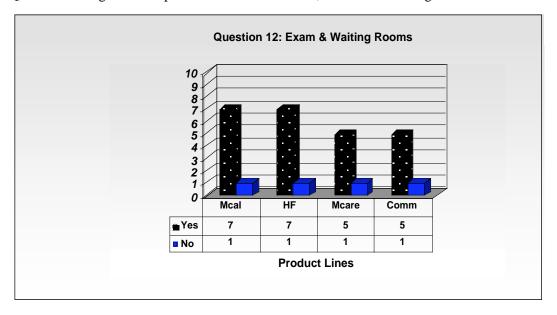


Question 12, Figure 3, Doors includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not their Plan Member Services staff or another department can provide upon request information on health care providers with accessible facilities including doors. Plans that have staff that can provide this information upon request include:

- Seven (7) out of eight (8) or over eighty-seven percent (87.5 %) of all responding Plans offering a Medi-Cal product.
- Seven (7) out of eight (8) or over eighty-seven percent (87.5 %) of all responding Plans offering a **Healthy Families** product.
- Five (5) out of six (6) or eighty-three percent (83%) of all responding Plans offering a Medicare product.
- Five (5) out of six (6) or eighty-three percent (83%) of all responding Plans offering a Commercial product.

Exam and waiting rooms

Question 12: Figure 4: Responses with Product Lines, Exam and Waiting Rooms

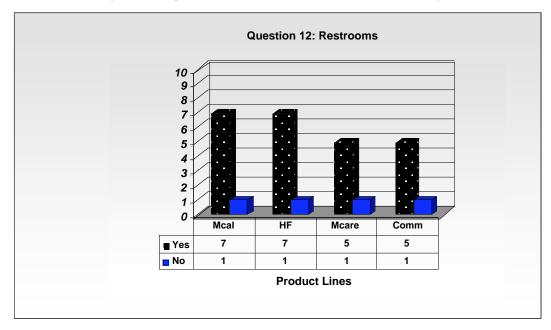


Question 12, Figure 4, Exam and Waiting Rooms includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not their Plan Member Services staff or another department can provide upon request information on health care providers with accessible facilities including exam and waiting rooms. Plans that have staff that can provide this information upon request include:

- Seven (7) out of eight (8) or over eighty-seven percent (87.5 %) of all responding Plans offering a **Medi-Cal** product.
- Seven (7) out of eight (8) or over eighty-seven percent (87.5 %) of all responding Plans offering a **Healthy Families** product.
- Five (5) out of six (6) or eighty-three percent (83%) of all responding Plans offering a Medicare product.
- Five (5) out of six (6) or eighty-three percent (83%) of all responding Plans offering a Commercial product.

Restrooms

Question 12: Figure 5: Responses with Product Lines, Exam and Waiting Rooms



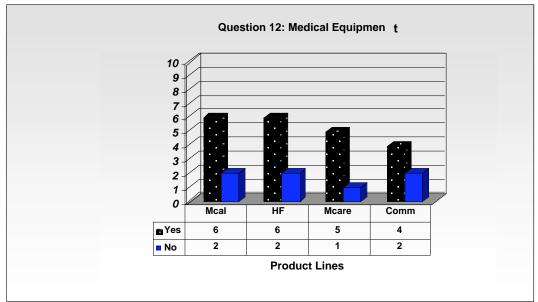
Question 12, Figure, 5, exam and waiting rooms includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not their Plan Member Services staff or another department can provide upon request information on health care providers with accessible facilities including restrooms rooms. Plans that have staff that can provide this information upon request include:

- Seven (7) out of eight (8) or over eighty-seven percent (87.5 %) of all responding Plans offering a **Medi-Cal** product.
- Seven (7) out of eight (8) or over eighty-seven percent (87.5 %) of all responding Plans offering a **Healthy Families** product.
- Five (5) out of six (6) or eighty-three percent (83%) of all responding Plans offering a Medicare product.
- Five (5) out of six (6) or eighty-three percent (83%) of all responding Plans offering a Commercial product.

Medical Equipment

(e.g lift equipment ,adjustable high/low exam tables & wheelchair scales)

Question 12: Figure 6: Responses with Product Lines, Exam and Waiting Rooms



Question 12, Figure 6, Medical Equipment includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not their Plan Member Services staff or another department can provide upon request information on health care providers with accessible facilities including medical equipment. Plans that have staff that can provide this information upon request include:

- Six (6) out of eight (8) or seventy-five percent (75%) of all responding Plans offering a Medi-Cal product.
- Six (6) out of eight (8) or seventy-five percent (75%) of all responding Plans offering a **Healthy Families** product.
- Five (5) out of six (6) or eighty-three percent (83%) of all responding Plans offering a **Medicare** product.
- Four (4) out of six (6), or over sixty-six percent (66.6%) of all responding Plans offering a **Commercial** product.

Comments from plans:

- 1. Member would be directed to provider's office.
- 2. One plan indicated they are currently developing this process.
- 3. Our Member services staff refer enrolees to the specific department of interest since there is no way for member services to know t particular logistics for each department at each facility. This is especially true at each medical center campuses where departments are located across many buildings.



Question 13

Does the Plan's Provider Directory include information regarding contracted providers with accessible facilities?

- Parking lot,
- Path-of-travel: into facility from parking lot & throughout facility
- Doors
- Exam and waiting rooms
- Medical Equipment (e.g. lift equipment, adjustable high/low exam tables & wheelchair scales)

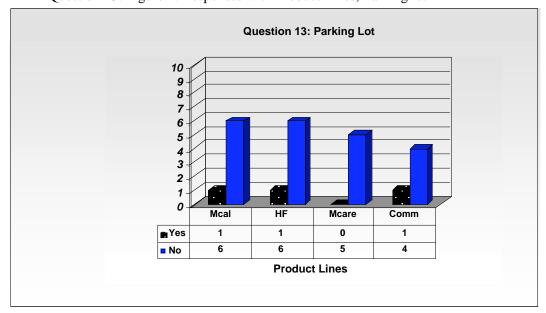
Question 13: Table 1: All Responses, *1 Plan No Response= NR

Total						ALTHY F	AMILIE	S		MEDI	CARE		COMMERCIAL				
Resp. (N= 9)	Yes	No	N/A	NR	Yes	No	N/A	NR	Yes	No	N/A	NR	Yes	No	N/A	NR	
*Parking lot	1	6	2	1	1	6	2	1	0	5	4	1	1	4	4	1	
-	10%	60%	20%	10%	10%	60%	20%	10%	0	50%	40%	10%	10%	40%	40%	10%	
*Path-of- travel: into facility from	1	6	2	1	1	6	2	1	0	5	4	1	1	4	4	1	
parking lot & throughout facility	10%	50%	20%	10%	10%	50%	20%	10%	0	40%	40%	10%	10%	30%	40%	10%	
*Doors	1	6	2	1	1	6	2	1	0	5	4	1	1	4	4	1	
D0013	10%	60%	20%	10%	10%	60%	20%	10%	0	50%	4	10%	1	40%	4	10%	
*Exam and	1	6	2	1	1	6	2	1	0	5	4	1	1	4	4	1	
waiting rooms	10%	60%	20%	10%	10%	60%	20%	10%	0	50%	40%	10%	10%	40%	40%	10%	
*Da atua aura	1	6	2	1	1	6	2	1	0	5	4	1	1	4	4	1	
*Restrooms	10%	60%	20%	10%	10%	60%	20%	10%	0	50%	40%	10%	10%	30%	40%	10%	
*Medical Equipment (e.g lift equipment	1	6	2	1	1	6	2	1	0	5	4	1	1	4	4	1	
,adjustable high/low exam tables & wheelchair scales)	10%	60%	20%	10%	10%	60%	20%	10%	0	50%	40%	21%	10%	40%	40%	10%	

Only one of the Plans reported having a Provider Directory which includes information on contracted providers with accessible facilities.



Parking lot



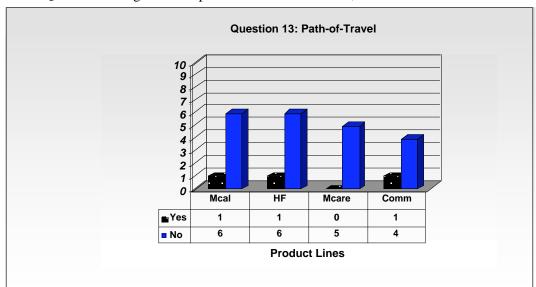
Question 13: Figure 1: Responses with Product Lines, Parking lot

Question 13, Figure 1, Parking lot includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not the Plan's Provider Directory includes information regarding contracted providers with accessible facilities including the parking lot. Plans that have provider directories which include information regarding contracted providers with accessible facilities include:

- One (1) out of seven (7) or fourteen percent (14 %) of all responding Plans offering a Medi-Cal product.
- One (1) out of seven (7) or fourteen percent (14 %) of all responding Plans offering a **Healthy** Families product.
- Zero (0) out of five (5) of all responding Plans offering a **Medicare** product.
- One (1) out of five (5) or twenty percent (20%) of all responding Plans offering a Commercial product.



Path-of-travel: into facility from parking lot & throughout facility



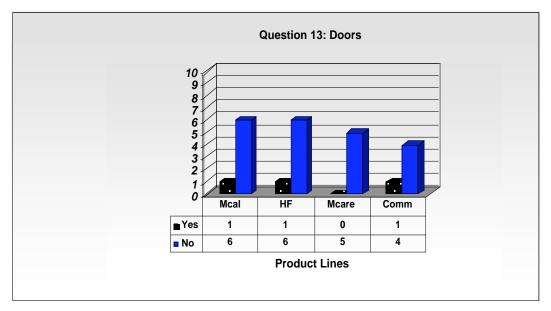
Question 13: Figure 2: Responses with Product Lines, Path-of-Travel

Question 13, Figure 2, Path-of-travel includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not the Plan's Provider Directory includes information regarding contracted providers with accessible facilities including the path-of-travel into the facility from the parking lot & throughout the facility. Plans that have provider directories which include information regarding contracted providers with accessible facilities include:

- One (1) out of seven (7) or fourteen percent (14 %) of all responding Plans offering a Medi-Cal product.
- One (1) out of seven (7) or fourteen percent (14 %) of all responding Plans offering a **Healthy Families** product.
- Zero (0) out of five (5) of all responding Plans offering a **Medicare** product.
- One (1) out of five (5) or twenty percent (20%) of all responding Plans offering a Commercial product.

Doors

Question 13: Figure 3: Responses with Product Lines, Doors



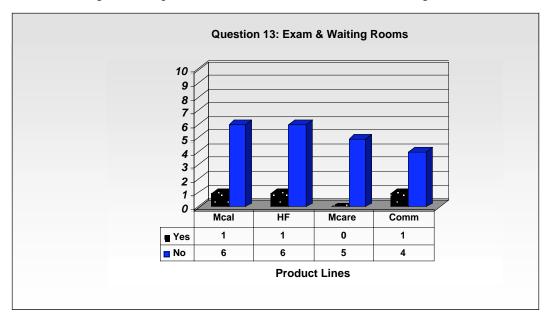
Question 13, Figure 3, Doors includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not the Plan's Provider Directory includes information regarding contracted providers with accessible facilities including the doors. Plans that have provider directories which include information regarding contracted providers with accessible facilities include:

- One (1) out of seven (7) or fourteen percent (14 %) of all responding Plans offering a Medi-Cal product.
- One (1) out of seven (7) or fourteen percent (14 %) of all responding Plans offering a **Healthy Families** product.
- Zero (0) out of five (5) of all responding Plans offering a **Medicare** product.
- One (1) out of five (5) or twenty percent (20%) of all responding Plans offering a Commercial product.



Exam and waiting rooms

Question 13: Figure 4: Responses with Product Lines, Exam and Waiting Rooms

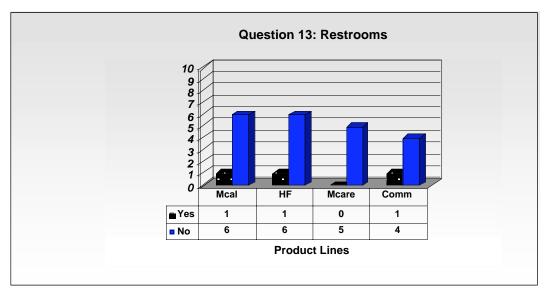


Question 13, Figure 4, Exam and Waiting Rooms includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not the Plan's Provider Directory includes information regarding contracted providers with accessible facilities including the exam and waiting rooms. Plans that have provider directories which include information regarding contracted providers with accessible facilities include:

- One (1) out of seven (7) or fourteen percent (14 %) of all responding Plans offering a Medi-Cal product.
- One (1) out of seven (7) or fourteen percent (14 %) of all responding Plans offering a **Healthy** Families product.
- Zero (0) out of five (5) of all responding Plans offering a **Medicare** product.
- One (1) out of five (5) or twenty percent (20%) of all responding Plans offering a Commercial product.

Restrooms

Question 13: Figure 5: Responses with Product Lines, Restrooms



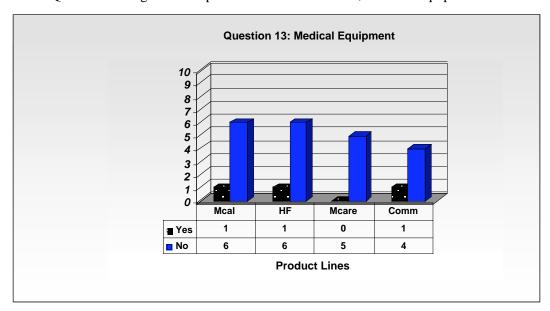
Question 13, Figure 5, Restrooms includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not the Plan's Provider Directory includes information regarding contracted providers with accessible facilities including the restrooms. Plans that have provider directories which include information regarding contracted providers with accessible facilities include:

- One (1) out of seven (7) or fourteen percent (14 %) of all responding Plans offering a Medi-Cal product.
- One (1) out of seven (7) or fourteen percent (14 %) of all responding Plans offering a **Healthy** Families product.
- Zero (0) out of five (5) of all responding Plans offering a **Medicare** product.
- One (1) out of five (5) or twenty percent (20%) of all responding Plans offering a Commercial product.



Medical Equipment

(e.g lift equipment ,adjustable high/low exam tables & wheelchair scales)



Question 13: Figure 6: Responses with Product Lines, Medical Equipment

Question 13, Figure 6, Medical Equipment includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not the Plan's Provider Directory includes information regarding contracted providers with accessible facilities including medical equipment. Plans that have provider directories which include information regarding contracted providers with accessible facilities include:

- One (1) out of seven (7), or fourteen percent (14 %) of all responding Plans offering a Medi-Cal product.
- One (1) out of seven (7), or fourteen percent (14 %) of all responding Plans offering a **Healthy** Families product.
- Zero (0) out of five (5), of all responding Plans offering a **Medicare** product.
- One (1) out of five (5), or twenty percent (20%) of all responding Plans offering a Commercial product.

Comments from plans:

- 1. Providers are responsible for complying with the Americans with Disabilities Act (ADA).
- 2. Several plans indicated they were developing information to be included in their provider directories.

Non-Emergency Medical Transportation

Question 14

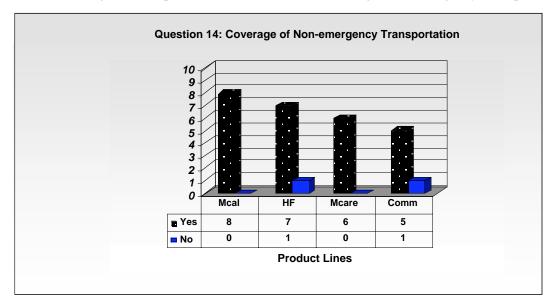
Is non-emergency medical transportation a covered benefit from the health plan?

Question 14: Table 1: All Responses

TOTAL RESPONSE (N=10)	Medi-Cal	HEALTHY FAMILIES	MEDICARE	COMMERCIAL	Average
Yes	8 (80%)	7 (70%)	6 (60%)	5 (50%)	6.5 (65%)
No	0	1 (10%)	0	1 (10%)	.5 (.5%)
N/A	2 (20%)	2 (20%)	4 (40%)	4 (40%)	3 (30%)
No Response	0	0	0	0	0

Over sixty-five percent (65%) of all responding Plans across all product lines provide non-emergency transportation as a covered benefit.

Question 14: Figure 1: Responses with Product Lines, Coverage Non-Emergency Transportation



Question 14, Figure 1, Coverage Non-Emergency Transportation, includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not the Plan provides non-emergency medical transportation as a covered benefit. Plans that provide non-emergency transportation include:

- Eight (8) out of eight (8) or one-hundred percent (100%) of all responding Plans offering a Medi-Cal product.
- Seven (7) out of Eight (8) or over eighty-seven percent (87 %) of all responding Plans offering a **Healthy Families** product.
- Six (6) out of six (6) or one-hundred percent (100%) of all responding Plans offering a Medicare product.



• Five (5) out of Six (6) or eighty-three percent (83%) of all responding Plans offering a Commercial product.

Comments from plans:

- Ambulance, litter van and wheelchair van medical transportation services are covered when the
 beneficiary's medical and physical condition is such that transport by ordinary means of public or
 private conveyance is medically contraindicated, and transportation is required for the purposes of
 obtaining medical care. Services must be requested by physician and approved by the health plan.
- 2. Non-emergency transportation for the transfer of a Member from a hospital to another hospital or facility or facility to home when: (A) Medically necessary, and (B) requested by a plan provider, and (C) authorized in advance by the participating health plan. Exclusions: Coverage for transportation by airplane, passenger care, taxi or other form of public conveyance may be excluded.
- 3. Non-emergency medical transportation via ambulance is a Health Plan benefit when it is deemed medically necessary or when such mode of transport is required to move a patient to a plan to plan authorized medical facility for post-stabilization care. Gurney and wheelchair van transportation is a Health Plan benefit only for prior authorized post-stabilization transports or psychiatric transports of members who are attending or leaving a psychiatric care appointment.

Question 15

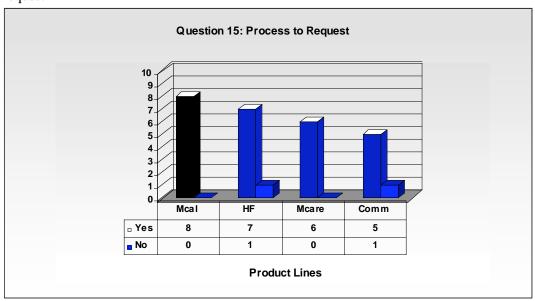
Is there a process for a member to request non-emergency medical transportation from the health plan?

Question 15: Table 1, All Responses

TOTAL RESPONSE		HEALTHY			
(N=10)	MEDI-CAL	FAMILIES	MEDICARE	COMMERCIAL	Average
Yes	8 (80%)	7 (70%)	6 (60%)	5 (50%)	6.5 (65%)
No	0	1 (10%)	0	1 (10%)	.5 (.5%)
N/A	2 (20%)	2 (20%)	4 (40%)	4 (40%)	3 (30%)
No Response	0	0	0	0	0

Over sixty-seven percent (65%) of all responding Plans across all product lines have a process for a member to request non-emergency medical transportation.

Question 15: Figure 2: Responses with Product Lines, Process to Request



Question 15, Figure 1, Process to Request, includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not the Plan has a process for members to request non-emergency medical transportation. Plans that have a process for members to request non-emergency transportation include:

- Eight (8) out of eight (8) or one-hundred percent (100%) of all responding Plans offering a Medi-Cal product.
- Seven (7) out of Eight (8) or over eighty-seven percent (87 %) of all responding Plans offering a **Healthy Families** product.



- Six (6) out of six (6) or one-hundred percent (100%) of all responding Plans offering a **Medicare** product.
- Five (5) out of Six (6) or eighty-three percent (83%) of all responding Plans offering a **Commercial** product.

Comments from plans:

- 1. Members can request non-emergency transportation by calling Member Services.
- 2. Case Management, Caregiver and Customer Service may arrange or refer to other resource



Question 16

When requesting non-emergency medical transportation does a member have the option of using accessible transportation including wheelchair accessible van services?

Question 16, Table 1, All Responses

TOTAL RESPONSE (N=10)	Medi-Cal	HEALTHY FAMILIES	MEDICARE	COMMERCIAL	Average
Yes	8 (80%)	7 (80%)	6 (60%)	5 (50%)	6.5 (65%)
No	0	1 (10%)	0	1 (10%)	.5 (.5%)
N/A	2 (20%)	2 (20%)	4 (40%)	4 (30%)	3 (30%)

Over sixty-seven percent (65%) of all responding Plans across all product lines have a process for a member to request non-emergency medical transportation including wheelchair accessible van services.

Question 16: Figure 1, Responses with Product Lines, Option to Request.

Question 16, Figure 2, Option to Request includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not the Plan when a member request non-emergency medical transportation they have the option of using accessible transportation including wheelchair accessible van services. Plans that give members the option to request accessible non-emergency transportation include:

- Eight (8) out of eight (8), or one-hundred percent (100%) of all responding Plans offering a Medi-Cal product,
- Seven (7) out of Eight (8), or over eighty-seven percent (87 %) of all responding Plans offering a **Healthy Families** product,
- Six (6) out of six (6), or one-hundred percent (100%) of all responding Plans offering a **Medicare** product and,



• Five (5) out of Six (6), or eighty-three percent (83%) of all responding Plans offering a **Commercial** product.

Comments from plans:

- 1. Members have an option of the type of non-emergency transportation available, subject to limitations in the program or benefit plan in which they are enrolled. Prior authorization may be required.
- 2. The most appropriate means of transportation would be utilized, when covered



Health Plan Written Materials

Question 17

Does the Plan have policies and procedures for production of materials in alternative formats?

- Large Print
- Braille
- Audio
- Electronic

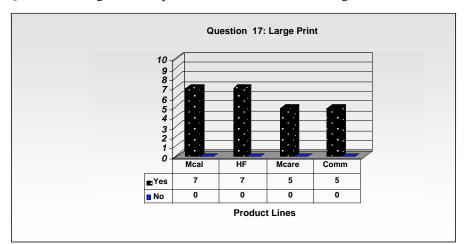
Question 17, Table 1, All Responses, *1 plan no response = NR

TOTAL		MEDI	-CAL		HE	ALTHY F	AMILIE	S		MED	ICARE		COMMERCIAL			
RESP. (N=9)	Yes	No	N/A	NR	Yes	No	N/A	NR	Yes	No	N/A	NR	Yes	No	N/A	NR
Large	7	0	2	1	7	0	2	1	5	0	4	1	5	0	4	1
print	70%	0	20%	10%	70%	0	20%	10%	50%	0	40%	10%	50%	0	40%	10%
Braille	5	2	2	1	5	2	2	1	4	1	4	1	3	2	4	1
D. a.m.o	60%	10%	20%	10%	60%	10%	20%	10%	40%	10%	40%	10%	30%	20%	40%	10%
Audio	6	1	2	1	6	1	2	1	5	0	4	1	4	1	4	1
format	60%	10%	20%	10%	60%	10%	20%	10%	50%	0	40%	10%	40%	10%	40%	10%
Electronic	6	1	2	1	6	1	2	1	5	0	4	1	4	1	4	1
Licotronic	60%	10%	20%	10%	60%	10%	20%	10%	50%	0	40%	10%	40%	10%	40%	10%



Large Print

One-hundred percent (100%) of all responding Plans across all product lines have policies and procedures for the production of materials in large print.



Question 17: Figure 1: Responses with Product Lines, Large Print

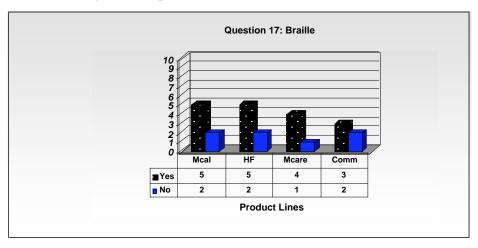
Question 17, Figure 1, Large Print includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not the Plan has policies and procedures for production of materials in alternative formats including large print. Plans that have policies and procedures for the production of materials in large print include:

- Seven (7) out of seven (7), or one-hundred percent (100%) of all responding Plans offering a Medi-Cal product,
- Seven (7) out of seven (7), or one-hundred percent (100 %) of all responding Plans offering a **Healthy Families** product,
- Five (5) out of five (5), or one-hundred percent (100%) of all responding Plans offering a **Medicare** product and,
- Five (5) out of five (5), or one-hundred percent (100%) of all responding Plans offering a **Commercial** product.



Braille

Question 17: Figure 3: Responses with Product Lines, Braille



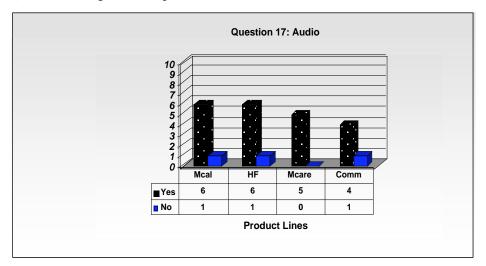
Question 17: Figure 2, Braille includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not the Plan has policies and procedures for production of materials in alternative formats including Braille. Plans that have policies and procedures for the production of materials in Braille include:

- Five (5) out of seven (7), or seventy-one percent (71%) of all responding Plans offering a Medi-Cal product,
- Five (5) out of seven (7), or seventy-one percent (71 %) of all responding Plans offering a **Healthy Families** product,
- Four (4) out of five (5), or eighty percent (80%) of all responding Plans offering a **Medicare** product and,
- Three (3) out of five (5), or sixty percent (60%) of all responding Plans offering a **Commercial** product.



Audio

Question 17: Figure 3: Responses with Product Lines, Audio



Question, 17, Figure 3, Audio includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not the Plan has policies and procedures for production of materials in alternative formats including audio. Plans that have policies and procedures for the production of materials in Braille include:

- Six (6) out of seven (7), or over eighty-five percent (85.7%) of all responding Plans offering a Medi-Cal product,
- Six (6) out of seven (7), or eighty-five percent (85.7 %) of all responding Plans offering a **Healthy Families** product,
- Five (5) out of five (5), or one-hundred percent (100%) of all responding Plans offering a **Medicare** product and,
- Four (4) out of five (5), or eighty percent (80%) of all responding Plans offering a Commercial product.



Electronic

Question 17: Figure 5: Responses with Product Lines, Electronic

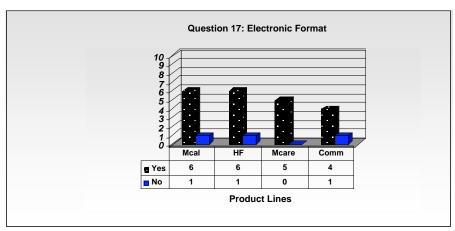


Figure five includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not the Plan has policies and procedures for production of materials in alternative formats including electronic format. Plans that have policies and procedures for the production of materials in electronic format include:

- Six (6) out of seven (7), or over eighty-five percent (85.7%) of all responding Plans offering a Medi-Cal product,
- Six (6) out of seven (7), or eighty-five percent (85.7 %) of all responding Plans offering a **Healthy Families** product,
- Five (5) out of five (5), or one-hundred percent (100%) of all responding Plans offering a **Medicare** product and,
- Four (4) out of five (5), or eighty percent (80%) of all responding Plans offering a **Commercial** product.

Comments from plans:

1. Braille can be provided by member request.



Question 18

Does the Plan have a process to inform members on how to request materials in alternative formats?

- Large PrintBraille
- Audio
- Electronic

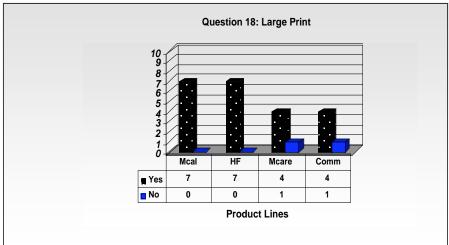
Question 18: Table 1: All Responses, *1 Plan no Response = NR

TOTAL		MEDI	-CAL		HE	althy F	AMILIE	S	Medicare				COMMERCIAL			
RESP. (N=9)	Yes	No	N/A	NR	Yes	No	N/A	NR	Yes	No	N/A	NR	Yes	No	N/A	NR
Large	7	0	2	1	7	0	2	1	4	1	4	1	4	1	4	1
print	70%	0	20%	10%	70%	0	20%	10%	40%	10%	40%	10%	40%	10%	40%	10%
Braille	5	2	2	1	5	2	2	1	4	1	4	1	3	2	4	1
Braino	50%	20%	20%	10%	50%	20%	20%	10%	40%	10%	40%	10%	30%	20%	40%	10%
Audio	6	1	2	1	6	1	2	1	4	1	4	1	4	1	4	1
format	60%	10%	20%	10%	60%	10%	20%	10%	40%	10%	40%	10%	40%	10%	40%	10%
Electronic	6	1	2	1	6	1	2	1	5	0	4	1	4	1	4	1
Electronic	60%	10%	20%	10%	60%	10%	20%	10%	50%	0%	40%	10%	40%	10%	40%	10%



Large Print

Question 18: Figure 1 Responses with Product Lines, Large Print

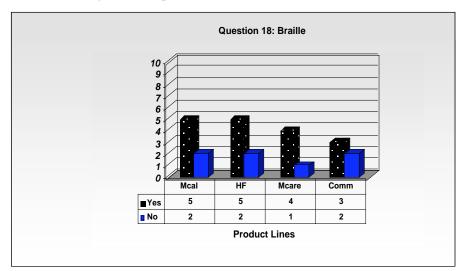


Question 18, Figure 1, Large Print includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not the Plan has a process to inform members on how to request materials in alternative formats including large print. Plans that have a process to inform members on how to request materials in alternative formats include:

- Seven (7) out of seven (7), or one-hundred percent (100%) of all responding Plans offering a Medi-Cal product.
- Seven (7) out of seven (7), or one-hundred percent (87 %) of all responding Plans offering a **Healthy Families** product.
- Four (4) out of five (5), or eighty percent (80%) of all responding Plans offering a **Medicare** product.
- Four (4) out of five (5), or eighty percent (80%) of all responding Plans offering a **Commercial** product.



Braille



Question 18: Figure 3: Responses with Product Lines, Braille

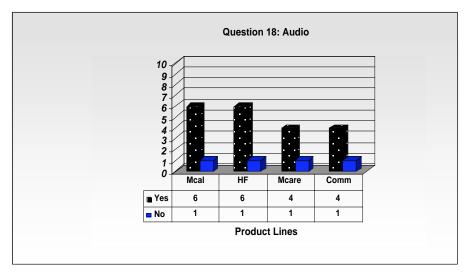
Question 18, Figure 3, Braille includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not the Plan has a process to inform members on how to request materials in alternative formats including Braille. Plans that have a process to inform members on how to request materials in alternative formats include:

- Five (5) out of seven (7), or seventy-one percent (71%) of all responding Plans offering a **Medi-Cal** product,
- Five (5) out of seven (7), or seventy-one percent (71 %) of all responding Plans offering a **Healthy Families** product,
- Four (4) out of five (5), or eighty percent (80%) of all responding Plans offering a **Medicare** product and,
- Three (3) out of five (5), or sixty percent (60%) of all responding Plans offering a **Commercial** product.



<u>Audio</u>

Question 18: Figure 3: Responses with Product Lines, Audio



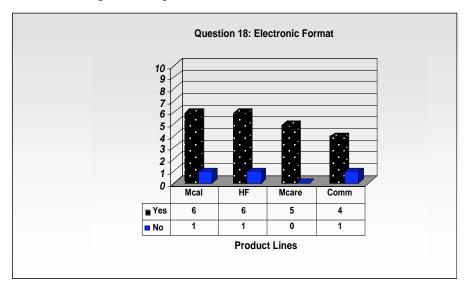
Question 18, Figure 3, Audio includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not the Plan has a process to inform members on how to request materials in alternative formats including Audio. Plans that have a process to inform members on how to request materials in alternative formats include:

- Six (6) out of seven (7), or over eighty-five percent (85.7%) of all responding Plans offering a Medi-Cal product,
- Six (6) out of seven (7), or over eighty-five percent (85.7 %) of all responding Plans offering a **Healthy Families** product,
- Four (4) out of five (5), or eighty percent (80%) of all responding Plans offering a **Medicare** product and,
- Four (4) out of five (5), or eighty percent (80%) of all responding Plans offering a **Commercial** product.



Electronic

Question 18: Figure 5: Responses with Product Lines, Electronic



Question 18, Figure 4, Electronic Format, includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not the Plan has a process to inform members on how to request materials in alternative formats including electronic format. Plans that have a process to inform members on how to request materials in alternative formats include:

- Six (6) out of seven (7), or over eighty-five percent (85.7%) of all responding Plans offering a **Medi-Cal** product,
- Six (6) out of seven (7), or eighty-five percent (85.7 %) of all responding Plans offering a **Healthy Families** product,
- Five (5) out of five (5), or one-hundred percent (100%) of all responding Plans offering a **Medicare** product and,
- Four (4) out of five (5), or eighty percent (80%) of all responding Plans offering a **Commercial** product.

Comments from plans:

- 1. Newsletter and EOC in upcoming distribution.
- 2. Braille available upon member request.



Does the Plan provide information and/or written materials to Health Care Providers and their staff on how members can request Plan materials in alternative formats?

- Large Print
- Braille
- Audio
- Electronic

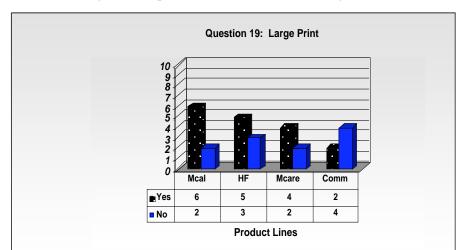
Question 19: Table 1, All Responses

	Zuesti	011 17.	I uoic	1, 111	i Kespo.	11000											
TOTAL RESP. (N=10)		MEDI	-CAL		HE	ALTHY F	AMILIE	S		MEDIC	ARE		COMERCIAL				
	Yes	No	N/A	NR	Yes	No	N/A	NR	Yes	No	N/A	NR	Yes	No	N/A	NR	
Large print	6	2	2	0	5	3	2	0	4	2	4	0	2	4	4	0	
	60%	20%	20%	0	50%	30%	20%	0	40%	20%	40%	0	20%	40%	40%	0	
Braille	5	3	2	0	4	4	2	0	4	2	4	0	2	4	4	0	
	50%	30%	20%	0	40%	40%	20%	0	30%	20%	50%	0	20%	40%	40%	0	
Audio format	4	4	4	2	4	0	2	4	4	0							
	40%	40%	20%	0	40%	40%	20%	0	40%	20%	40%	0	20%	40%	40%	0	
Electronic	5	3	2	0	5	3	2	0	3	3	4	0	2	4	4	0	
	50%	30%	20%	0	50%	30%	20%	0	30%	30%	40%	0	20%	40%	40%	0	
AVERAGE	5	3	2	0	4.5	3.5	2	0	3.75	2.25	4	0	2	4	4	0	
	50%	30%	20%	0	45%	35%	20%	0	37.5%	22.5%	40%	0	20%	40%	40%	0	
						Sun	MARY A	AVERA	GE								
						Provide I	nformat	ion: 3.8	1 (38%)								
					Do	not prov	ide infor	mation	3.18 (32%	·)							
							NA 3 (30%)									
						No	Respon	se 0 (0%	6)								

Thirty-eight percent (38%) of all responding Plans across all product lines provide information and/or written materials to Health Care Providers and their staff on how members can request Plan materials in alternative formats.



Large Print



Question 19: Figure 1 Responses with Product Lines, Large Print

Question 19, Figure 1, Large Print includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not the plan provides information and/or written materials to Health Care Providers and their staff on how members can request Plan materials in alternative formats including large print. Plans that provide information and/or written information include:

- Six (6) out of eight (8), or seventy-five percent (75%) of all responding Plans offering a **Medi-Cal** product.
- Five (5) out of eight (8), or over sixty-two percent (62.5 %) of all responding Plans offering a **Healthy Families** product.
- Four (4) out of six (6), or over sixty-six percent (66.6%) of all responding Plans offering a **Medicare** product.
- Two (2) out of six (6), or thirty-three percent (33%) of all responding Plans offering a **Commercial** product.



Braille

Question 19: Braille

10
9
8
7
65
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3
2
10
Mcal HF Mcare Comm
Yes 5 4 4 2
No 3 4 2 4

Product Lines

Question 19: Figure 2: Responses with Product Lines, Braille

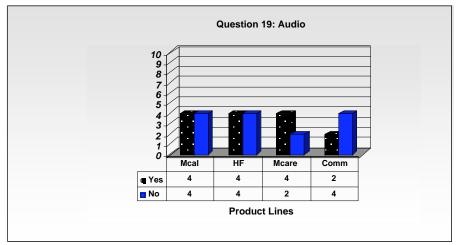
Question 19, Figure 2, Large Print includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not the plan provides information and/or written materials to Health Care Providers and their staff on how members can request Plan materials in alternative formats including Braille. Plans that provide information and/or written information include:

- Five (5) out of eight (8), or sixty-two percent (62%) of all responding Plans offering a Medi-Cal product.
- Four (4) out of eight (8), or fifty percent (50 %) of all responding Plans offering a **Healthy** Families product.
- Four (4) out of six (6), or over sixty-six (66%) of all responding Plans offering a **Medicare** product.
- Two (2) out of six (6), or thirty-three percent (33%) of all responding Plans offering a **Commercial** product.



<u>Audio</u>

Question 19: Figure 3: Responses with Product Lines, Audio



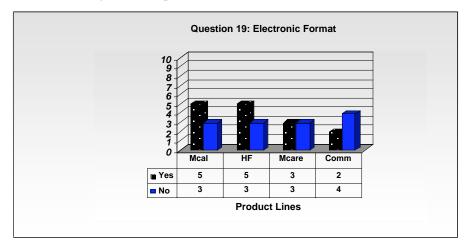
Question 19, Figure 3, Large Print includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not the plan provides information and/or written materials to Health Care Providers and their staff on how members can request Plan materials in alternative formats including audio. Plans that provide information and/or written information include:

- Four (4) out of eight (8), or fifty percent (50%) of all responding Plans offering a Medi-Cal product.
- Four (4) out of eight (8), or fifty percent (50 %) of all responding Plans offering a **Healthy Families** product.
- Four (4) out of six (6), or over sixty-six percent (66%) of all responding Plans offering a **Medicare** product.
- Two (2) out of six (6), or thirty-three (33%) of all responding Plans offering a Commercial product.



Electronic

Question 19: Figure 5: Responses with Product Lines, Electronic



Question 19, Figure 5, Large Print includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not the plan provides information and/or written materials to Health Care Providers and their staff on how members can request Plan materials in alternative formats including electronic format. Plans that provide information and/or written information include:

- Five (5) out of eight (8), or over sixty-two percent (62.5%) of all responding Plans offering a Medi-Cal product.
- Five (5) out of eight (8), or sixty-two percent (62.5 %) of all responding Plans offering a **Healthy Families** product.
- Three (3) out of six (6), or fifty (50%) of all responding Plans offering a **Medicare** product.
- Two (2) out of six (6), or thirty-three (33%) of all responding Plans offering a Commercial product.

Comments from plans:

- 1. One plan indicated they are currently developing these materials for providers
- 2. Providers are to refer members to the plan.



Does the Plan provide disability access training to Member Service staff on how members can request Plan materials in alternative formats?

- Large Print
- Braille
- Audio
- Electronic

Question: 20, Table 1, All Responses

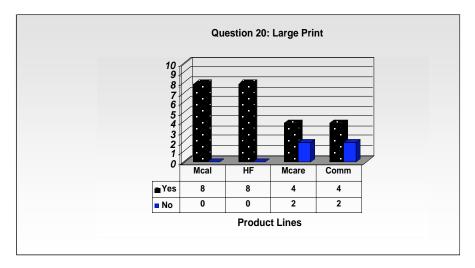
TOTAL		Medi-	-CAL		HE	ALTHY	FAMILI	ES		MED	ICARE		COMMERCIAL			
RESP. (N=10)	Yes	No	N/A	NR	Yes	No	N/A	NR	Yes	No	N/A	NR	Yes	No	N/A	NR
Large	8	0	2	0	8	0	2	0	4	2	4	0	4	2	4	0
print	80%	0	20%	0	80%	0	20%	0	40%	20%	40%	0	40%	10%	40%	10%
Braille	6	2	2	0	6	2	2	0	4	2	4	0	3	3	4	0
Dianic	60%	20%	20%	0	60%	20%	20%	0	50%	10%	30%	0	30%	30%	40%	10%
Audio	6	2	2	0	6	2	2	0	4	2	4	0	4	2	4	0
format	60%	20%	20%	0	60%	20%	20%	0	40%	20%	40%	0	40%	10%	40%	10%
Electronic	6	2	2	0	6	2	2	0	4	2	4	0	3	3	4	0
Licetronic	60%	20%	20%	0	60%	20%	20%	0	40%	20%	40%	0	40%	20%	40%	0%
	6.5	1.5	2	0	6.5	1.5	4	0	4	2	4	0	3.5	2.5	4	0
AVERAGE	65 %	15%	20%	0	65%	15%	40%	0	40%	20%	40%	0	35%	25%	40%	0
						Su	MMARY	AVERA	AGE							
						Provi	de traini	ng: 5.12	(51%)							
					C	o not p	rovide t	raining 1	1.87 (19	%)						
							NA 3.	5 (35%)								
						N	o Respo	nse 0 (0	1%)							

Fifty-one percent (51%) of all responding Plans across all product lines provide disability access training to Member Service staff on how members can request Plan materials in alternative formats.



Large Print

Question 20: Figure 1 Responses with Product Lines, Large Print



Question 20, Figure 1, Large Print includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not the Plan provides disability access training to Member Service staff on how members can request Plan materials in alternative formats including large print. Plans that provide disability access training to Member Service staff:

- Eight (8) out of eight (8), or one-hundred percent (100%) of all responding Plans offering a Medi-Cal product.
- Eight (8) out of eight (8), or one-hundred percent (100%) of all responding Plans offering a **Healthy Families** product.
- Four (4) out of six (6), or over sixty-six percent (66.6%) of all responding Plans offering a **Medicare** product.
- Four (4) out of six (6), or over sixty-six percent (66.6%) of all responding Plans offering a **Commercial** product.



Braille

Question 20: Braille

10

8

7

6

5

4

3

Westion 20: Braille

Product Lines

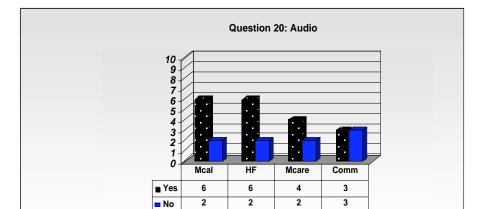
Question 20: Figure 2: Responses with Product Lines, Braille

Question 20, Figure 2, Braille includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not the Plan provides disability access training to Member Service staff on how members can request Plan materials in alternative formats including Braille. Plans that provide disability access training to Member Service staff:

- Six (6) out of eight (8), or seventy-five percent (75%) of all responding Plans offering a Medi-Cal product.
- Six (6) out of eight (8), or seventy-five percent (75%) of all responding Plans offering a **Healthy Families** product.
- Four (4) out of six (6), or over sixty-six percent (66.6%) of all responding Plans offering a **Medicare** product.
- Three (3) out of six (6), or fifty percent (50%) of all responding Plans offering a **Commercial** product.



<u>Audio</u>



Question 20: Figure 3: Responses with Product Lines, Audio

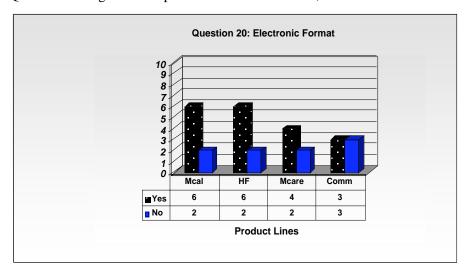
Question 20, Figure 3, Audio includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not the Plan has a process to inform members on how to request materials in alternative formats including Audio. Plans that have a process to inform members on how to request materials in alternative formats include:

Product Lines

- Six (6) out of eight (8), or seventy-five percent (75%) of all responding Plans offering a **Medi-Cal** product.
- Six (6) out of eight (8), or seventy-five percent (75 %) of all responding Plans offering a **Healthy Families** product.
- Four (4) out of six (6), or over sixty-six percent (66.6%) of all responding Plans offering a **Medicare** product.
- Three (3) out of six (6), or fifty percent (50%) of all responding Plans offering a **Commercial** product.



Electronic



Question 20: Figure 5: Responses with Product Lines, Electronic

Question 20, Figure 4, Electronic Format, includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not the Plan has a process to inform members on how to request materials in alternative formats including electronic format. Plans that have a process to inform members on how to request materials in alternative formats include:

- Six (6) out of eight (8), or over seventy-five percent (75%) of all responding Plans offering a Medi-Cal product,
- Six (6) out of eight (8), or seventy-five percent (75 %) of all responding Plans offering a **Healthy Families** product,
- Four (4) out of six (6), or sixty-six percent (66.6%) of all responding Plans offering a **Medicare** product and,
- Three (3) out of six (6), fifty percent (50%) of all responding Plans offering a Commercial product.

Comments from plans:

- 1. Basic training for alternate format requests.
- 2. One plan indicated this training is currently in development



When members request materials in alternative formats how long does it take for the plan to mail the materials to a member?

- Same day
- Within two business days
- Within 5 business days
- Within 10 Business days

Question 21: Table 1: All Responses, *5 Plans no Response = NR

	Ş	SAME DA	Y		/ITHIN : NESS D	_		Within Busine Days	SS		VITHIN SINESS I	
	Yes	No	NR	Yes	No	NR	Yes	No	NR	Yes	No	NR
Large	3	5	2	4	4	2	6	2	2	8	0	2
print	30%	50%	20%	40%	40%	20%	60%	20%	20%	80%	0	20%
Braille	1	4	5	1	4	5	2	3	5	5	0	5
2.4	10%	40%	50%	10%	40%	50%	20%	30%	50%	50%	0	50%
Audio	2	4	4	2	4	4	3	3	4	6	0	4
format	20%	40%	40%	20%	40%	40%	30%	30%	40%	60%	0	40%
Electronic	3	4	3	5	2	3	6	1	3	7	3	0
LICCHOTTIC	30%	40%	30%	50%	20%	30%	60%	10%	30%	70%	30%	0

Five (5) Plans did not respond to the question.

Large Print

- Three (3) out of eight (8), or over thirty-seven percent (37.5%) of all responding Plans mail materials the **same day.**
- Four (4) out of eight (8), or fifty percent (50%) of all responding Plans mail materials within **two business days.**
- Six (6) out of eight (8), or seventy-five percent (75%) of all responding Plans mail materials within **five business days.**
- Eight (8) out of eight (8), or one-hundred percent (100%) of all responding Plans mail materials within 10 business days.

Braille

- One (1) out of five (5), or twenty percent (20%) of all responding Plans mail materials the same day.
- One (1) out of five (5), or fifty percent (20%) of all responding Plans mail materials within **two business days.**
- Two (2) out of five (5), or forty percent (40%) of all responding Plans mail materials within five business days.
- Five (5) out of five (5), or one-hundred percent (100%) of all responding Plans mail materials within 10 business days.



Audio

- Two (2) out of five (5), or forty percent (40%) of all responding Plans mail materials the same day.
- Two (2) out of five (5), or forty percent (40%) of all responding Plans mail materials within two business days.
- Three (3) out of six (6), or fifty percent (50%) of all responding Plans mail materials within **five business days.**
- Six (6) out of six (6), or one-hundred percent (100%) of all responding Plans mail materials within 10 business days.

Electronic

- Three (3) out of seven (7), or over forty-two percent (42.8.%) of all responding Plans mail materials the same day.
- Five (5) out of seven (7), or seventy-one (71%) of all responding Plans mail materials within **two business days.**
- Six (6) out of seven (7), or over eighty five-percent (85.7%) of all responding Plans mail materials within **five business days.**
- Seven (7) out of ten (10), or seventy percent (70%) of all responding Plans mail materials within 10 business days.

Comments from plans:

- 1. No one has eve requested audio
- 2. Depends upon the language. If lengthy material in languages other than Spanish may take longer than 10 days.
- 3. The question needs to be reworked. The lines of business are not indicated. Each line of business would need to have each of information could be provided to a member depends on the requested alternative format, the length, content and format of the document, and the required language.
- 4. is open to interpretation, are you asking about materials we produce as matter of policy in alternate format and therefore keep stocked ... OR are you asking about materials made available in alternate format upon request.
- 5. The plan does not develop alternative formats internally, but rather it uses vendors to provide such materials to members. The turnaround timeframes thus are dependent on the type of format, the size of the document, and the availability of the vendor..



Is the Plan's Provider Directory available on request in alternative formats?

- Large Print
- Braille
- Audio
- Electronic

Question 22: Table 1: All Responses, *1 Plan no Response = NR

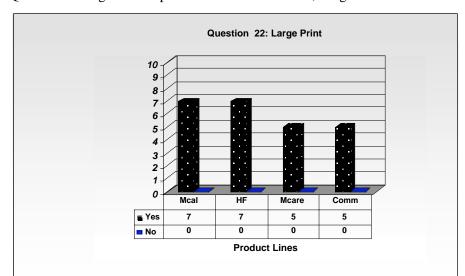
		Medi	-Cal		HE	ALTHY	FAMILI	ES		MED	ICARE		COMMERCIAL					
	Yes	No	N/A	NR	Yes	No	N/A	NR	Yes	No	N/A	NR	Yes	No	N/A	NR		
Large	7	0	2	1	7	0	2	1	5	0	4	1	5	0	4	1		
print	70%	0	20%	10%	70%	0	20%	10%	60%	0	30%	10%	50%	0	40%	10%		
Braille	5	2	2	1	5	2	2	1	4	1	4	1	3	2	4	1		
	50%	20%	20%	10%	50%	20%	20%	10%	40%	10%	40%	10%	30%	20%	40%	10%		
Audio	6	1	2	1	6	1	2	1	5	0	4	1	4	1	4	1		
format	60%	10%	20%	10%	60%	10%	20%	10%	50%	0	40%	10%	40%	10%	40%	10%		
Electronic	7	0	2	1	7	0	2	1	5	0	4	1	5	0	4	1		
Licetonic	70%	0	20%	10%	70%	0	20%	10%	50%	0	40%	10%	50%	0	40%	10%		

One (1) Plan did not respond to this question.



Large Print

One-hundred percent (100%) of all responding Plans across all product lines offer Plan's Provider Directories on request in large print.



Question 22: Figure 1 Responses with Product Lines, Large Print

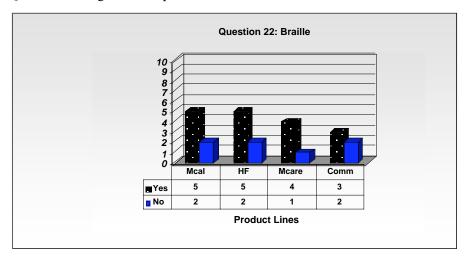
Question 22, Figure 1, Large Print includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not the Plan's provider directories are available on request in large print. Plans that offer provider directories in large print include:

- Seven (7) out of Seven (7), or one-hundred percent (100%) of all responding Plans offering a Medi-Cal product.
- Seven (7) out of seven (7), or one-hundred percent (100%) of all responding Plans offering a **Healthy Families** product.
- Five (5) out of five (5), or one-hundred percent (100%) of all responding Plans offering a **Medicare** product.
- Five (5) out of five (5), or over sixty-six percent (100 %) of all responding Plans offering a Commercial product.



Braille

Question 22: Figure 2: Responses with Product Lines, Braille



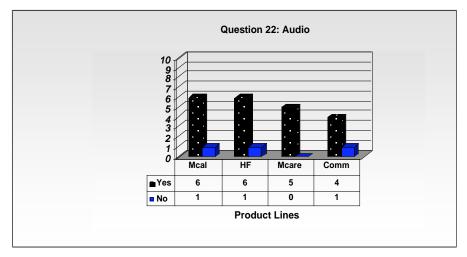
Question 22, Figure 2, Braille includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not the Plan's provider directories are available on request in Braille. Plans that offer provider directories in Braille include:

- Five (5) out of seven (7), or seventy-one percent (71%) of all responding Plans offering a Medi-Cal product.
- Five (5) out of seven (7), or seventy-one percent (71%) of all responding Plans offering a **Healthy Families** product.
- Four (4) out of five (5), or sixty percent (80%) of all responding Plans offering a Medicare product.
- Three (3) out of five (5), or sixty percent (60%) of all responding Plans offering a **Commercial** product.



Audio

Question 22: Figure 3: Responses with Product Lines, Audio



Question 22, Figure 3, Audio includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not the Plan's provider directories are available on request in audio. Plans that offer their Provider Directory in audio include:

- Six (6) out of seven (7), or over eighty-five percent (85.7%) of all responding Plans offering a Medi-Cal product.
- Six (6) out of seven (7), or over eighty-five percent (85.7 %) of all responding Plans offering a **Healthy Families** product.
- Five (5) out of five (5), or one-hundred percent (100%) of all responding Plans offering a **Medicare** product.
- Four (4) out of five (5), or eighty percent (80%) of all responding Plans offering a **Commercial** product.



Electronic

One-hundred percent (100%) of all responding Plans across all product lines offer Plan's Provider Directories on request in electronic format.

Question 22: Figure 4: Responses with Product Lines, Electronic

Question 22, Figure 4, Electronic format includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not the Plan's provider directories are available on request in electronic format. Plans that offer provider directories in electronic format include:

- Seven (7) out of Seven (7), or one-hundred percent (100%) of all responding Plans offering a Medi-Cal product.
- Seven (7) out of seven (7), or one-hundred percent (100%) of all responding Plans offering a **Healthy Families** product.
- Five (5) out of five (5), or one-hundred percent (100%) of all responding Plans offering a **Medicare** product.
- Five (5) out of five (5), or over sixty-six percent (100 %) of all responding Plans offering a Commercial product.

Comments from plans:

1. Braille available upon request of the member.



Is the Plan's Member Handbook / Evidence of Coverage (EOC) available on request in alternative formats?

- Large PrintBraille
- Audio
- Electronic

Question 23: Table 1: All Responses, *1 Plan no Response = NR

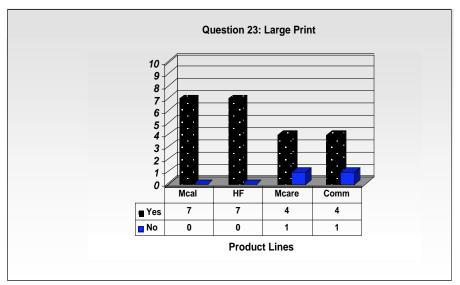
		Medi-	-Cal		НЕ	ALTHY	FAMILI	ES		MED	ICARE		COMMERCIAL				
	Yes	No	N/A	NR	Yes	No	N/A	NR	Yes	No	N/A	NR	Yes	No	N/A	NR	
Large	7	0	2	1	7	0	2	1	4	1	4	1	4	1	4	1	
print	70%	0	20%	10%	70%	0	20%	10%	40%	10%	40%	10%	40%	10%	40%	10%	
Braille	4	3	2	1	4	3	2	1	3	2	4	1	3	2	4	1	
Bramo	40%	30%	20%	10%	40%	30%	20%	10%	30%	20%	40%	10%	30%	20%	40%	10%	
Audio	4	3	2	1	4	3	2	1	3	2	4	1	4	1	4	1	
format	40%	30%	20%	10%	40%	30%	20%	10%	30%	20%	40%	10%	40%	10%	40%	10%	
Electronic	7	0	2	1	7	0	2	1	5	0	4	1	5	0	4	1	
LICCHOTTIC	70%	0	20%	10%	70%	0	20%	10%	50%	0	40%	10%	50%	0	40%	10%	

One (1) Plan did not respond to this question.



Large Print

Question 23: Figure 1 Responses with Product Lines, Large Print



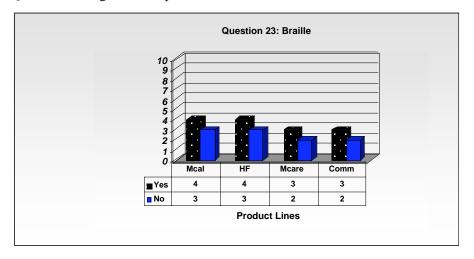
Question 23, Figure 1, Large Print includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not the Plan's Member Handbooks / Evidence of Coverage (EOC)s are available on request in large print. Plans that offer their Member Handbooks / Evidence of Coverage (EOC)s in large print include:

- Seven (7) out of Seven (7), or one-hundred percent (100%) of all responding Plans offering a Medi-Cal product.
- Seven (7) out of seven (7), or one-hundred percent (100%) of all responding Plans offering a **Healthy Families** product.
- Four (4) out of five (5), or eighty percent (80%) of all responding Plans offering a **Medicare** product.
- Four (4) out of five (5), or eighty percent (80 %) of all responding Plans offering a **Commercial** product.



Braille

Question 23: Figure 2: Responses with Product Lines, Braille



Question 23, Figure 2, Braille includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not the Plan's Member Handbooks / Evidence of Coverage (EOC)s are available on request in Braille. Plans that offer their Member Handbooks / Evidence of Coverage (EOC)s in Braille include:

- Four (4) out of seven (7), or fifty-seven percent (57%) of all responding Plans offering a Medi-Cal product.
- Four (4) out of seven (7), or fifty- seven percent (57%) of all responding Plans offering a **Healthy Families** product.
- Three (3) out of five (5), or sixty percent (60%) of all responding Plans offering a **Medicare** product.
- Three (3) out of five (5), or sixty percent (60%) of all responding Plans offering a **Commercial** product.



<u>Audio</u>

Question 23: Audio Format

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Mcal HF Mcare Comm

Yes 4
4
3
4

Question 23: Figure 3: Responses with Product Lines, Audio

■ Yes

Question 23, Figure 3, Audio includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not the Plan's Member Handbooks / Evidence of Coverage (EOC)s are available on request in audio. Plans that offer their Member Handbooks / Evidence of Coverage (EOC) in audio include:

Product Lines

- Four (4) out of seven (7), or fifty-seven percent (57%) of all responding Plans offering a Medi-Cal product.
- Four (4) out of seven (7), or fifty-seven percent (57 %) of all responding Plans offering a **Healthy Families** product.
- Three (3) out of five (5), or sixty percent (60%) of all responding Plans offering a Medicare product.
- Four (4) out of five (5), or eighty percent (80%) of all responding Plans offering a **Commercial** product



Electronic

One-hundred percent (100%) of all responding Plans across all product lines offer Provider Directories on request in electronic format.

Question 23: Electronic Format

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Mcal HF Mcare Comm

Yes 7 7 5 5
No 0 0 0 0 0

Product Lines

Question 23: Figure 4: Responses with Product Lines, Electronic

Question 23, Figure 4, Electronic format includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not the Plan's Member Handbooks / Evidence of Coverage (EOC)s are available on request in electronic format. Plans that offer Member Handbooks / Evidence of Coverage (EOC)s in electronic format include:

- Seven (7) out of Seven (7), or one-hundred percent (100%) of all responding Plans offering a Medi-Cal product.
- Seven (7) out of seven (7), or one-hundred percent (100%) of all responding Plans offering a **Healthy Families** product.
- Five (5) out of five (5), or one-hundred percent (100%) of all responding Plans offering a **Medicare** product.
- Five (5) out of five (5), or over sixty-six percent (100 %) of all responding Plans offering a Commercial product.



Are the Plan's newsletters available on request in alternative formats?

- Large Print
- Braille
- Audio
- Electronic

Question 24: Table 1: All Responses, *1 Plan no Response = N

		Medi-	-CAL		HE	ALTHY	FAMILI	ES		MED	ICARE		COMMERCIAL				
	Yes	No	N/A	NR	Yes	No	N/A	NR	Yes	No	N/A	NR	Yes	No	N/A	NR	
Large	7	0	2	1	7	0	2	1	5	0	4	1	5	0	4	1	
print	70%	0	20%	10%	70%	0	20%	10%	50%	0	40%	10%	50%	0	40%	10%	
Braille	5	2	2	1	5	2	2	1	3	2	4	1	4	1	4	1	
2.4	50%	20%	20%	10%	50%	20%	20%	10%	30%	20%	40%	10%	40%	10%	40%	10%	
Audio	5	2	2	1	5	2	2	1	4	1	4	1	4	1	4	1	
format	50%	20%	20%	10%	50%	20%	20%	10%	30%	20%	40%	10%	40%	10%	40%	10%	
Electronic	7	0	2	1	7	0	2	1	5	0	4	1	5	0	4	1	
Licetroffic	70%	0	20%	10%	70%	0	20%	10%	50%	0	40%	10%	50%	0	40%	10%	

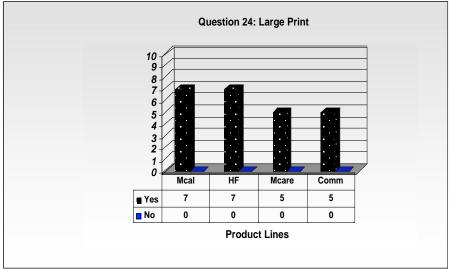
One (1) Plan did not respond to this question.



Large Print

One-hundred percent (100%) of all responding Plans offer newsletters on request in large print.

Question 24: Figure 1 Responses with Product Lines, Large Print



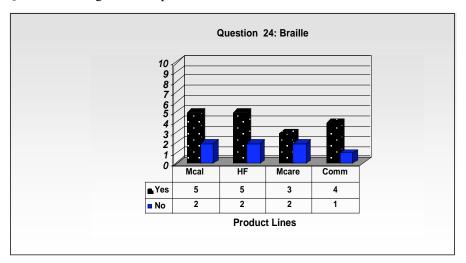
Question 24, Figure 1, Large Print includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not the Plan's newsletters are available on request in large print. Plans that offer newsletters in large print include:

- Seven (7) out of Seven (7), or one-hundred percent (100%) of all responding Plans offering a Medi-Cal product.
- Seven (7) out of seven (7), or one-hundred percent (100%) of all responding Plans offering a **Healthy Families** product.
- Five (5) out of five (5), or one-hundred percent (100%) of all responding Plans offering a **Medicare** product.
- Five (5) out of five (5), or over sixty-six percent (100 %) of all responding Plans offering a Commercial product.



Braille

Question 24: Figure 2: Responses with Product Lines, Braille



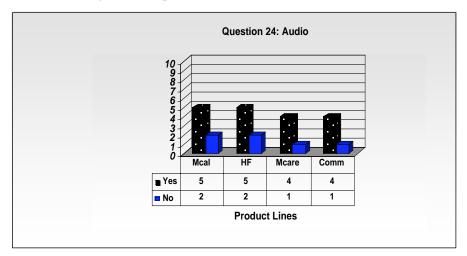
Question 23, Figure 2, Braille includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not the Plan's newsletters are available on request in Braille. Plans that offer newsletters in Braille include:

- Five (5) out of seven (7), or seventy-one percent (71%) of all responding Plans offering a **Medi-Cal** product.
- Five (5) out of seven (7), or seventy-one percent (71%) of all responding Plans offering a **Healthy Families** product.
- Three (3) out of five (5), or sixty percent (60%) of all responding Plans offering a Medicare product.
- Four (4) out of five (5), or eighty percent (80%) of all responding Plans offering a **Commercial** product.



Audio

Question 24: Figure 3: Responses with Product Lines, Audio



Question 24, Figure 3, Audio includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not the Plan's newsletters are available on request in audio. Plans that offer newsletters in audio include:

- Five (5) out of seven (7), seventy-one percent (71%) of all responding Plans offering a **Medi-Cal** product.
- Five (5) out of seven (7), or seventy-one percent (71 %) of all responding Plans offering a **Healthy Families** product.
- Four (4) out of five (5), or eighty percent (80%) of all responding Plans offering a **Medicare** product.
- Four (4) out of five (5), or eighty percent (80%) of all responding Plans offering a **Commercial** product.



Electronic

One-hundred percent (100%) of all responding Plans offer newsletters on request in electronic format.

Question 24: Electronic Format

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Mcal HF Mcare Comm
Yes 7 7 5 5
No 0 0 0 0 0

Product Lines

Question 24: Figure 4: Responses with Product Lines, Electronic

Question 24, Figure 4, Electronic format includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not the Plan's newsletters are available on request in electronic format. Plans that offer newsletters in electronic format include:

- Seven (7) out of Seven (7), or one-hundred percent (100%) of all responding Plans offering a Medi-Cal product.
- Seven (7) out of seven (7), or one-hundred percent (100%) of all responding Plans offering a **Healthy Families** product.
- Five (5) out of five (5), or one-hundred percent (100%) of all responding Plans offering a **Medicare** product.
- Five (5) out of five (5), or over sixty-six percent (100 %) of all responding Plans offering a Commercial product.

Comments from plans:

1. We also post our newsletters on our website.



Are Plan grievance materials available on request in alternative formats?

- Large Print Braille
- Audio
- Electronic

Question 25: Table 1: All Responses, *1 Plan no Response = N

		Medi-	-CAL		HE	ALTHY	FAMILI	ES		MED	ICARE		COMMERCIAL				
	Yes	No	N/A	NR	Yes	No	N/A	NR	Yes	No	N/A	NR	Yes	No	N/A	NR	
Large	7	0	2	1	7	0	2	1	5	0	4	1	5	0	4	1	
print	70%	0	20%	10%	70%	0	20%	10%	50%	0	40%	10%	50%	0	40%	10%	
Braille	5	2	2	1	5	2	2	1	3	2	4	1	4	1	4	1	
Braino	50%	20%	20%	10%	50%	20%	20%	10%	30%	20%	40%	10%	40%	10%	40%	10%	
Audio	6	1	2	1	6	1	2	1	4	1	4	1	4	1	4	1	
format	60%	10%	20%	10%	60%	10%	20%	10%	40%	10%	40%	10%	40%	10%	40%	10%	
Electronic	8	0	2	0	8	0	2	0	6	0	4	0	5	0	4	1	
Licetionic	80%	0	20%	0	80%	0	20%	0	60%	0	40%	0	50%	0	40%	10%	

One (1) plan did not respond to this question.



Large Print

One-hundred percent (100%) of all responding Plans offer Grievance materials on request in large print.

Question 25: Large Print

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9
87
65
43
21
10
Mcal HF Mcare Comm
Yes 7 7 5 5
No 0 0 0 0 0

Product Lines

Question 25: Figure 1 Responses with Product Lines, Large Print

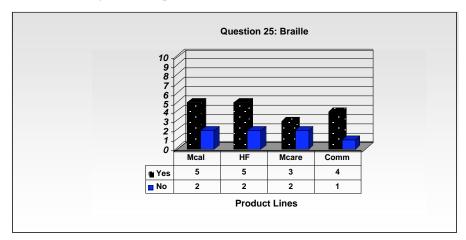
Question 25, Figure 1, Large Print includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not the Plan's grievance materials are available on request in large print. Plans that offer grievance materials in large print include:

- Seven (7) out of Seven (7), or one-hundred percent (100%) of all responding Plans offering a Medi-Cal product.
- Seven (7) out of seven (7), or one-hundred percent (100%) of all responding Plans offering a **Healthy Families** product.
- Five (5) out of five (5), or one-hundred percent (100%) of all responding Plans offering a **Medicare** product.
- Five (5) out of five (5), or over sixty-six percent (100 %) of all responding Plans offering a Commercial product.



Braille

Question 25: Figure 2: Responses with Product Lines, Braille



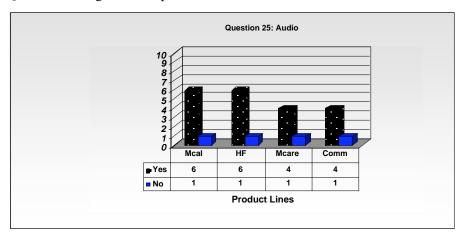
Question 25, Figure 2, Braille includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not the Plan's grievance materials are available on request in Braille. Plans that offer grievance materials in Braille include:

- Five (5) out of seven (7), or seventy-one percent (71%) of all responding Plans offering a **Medi-Cal** product.
- Five (5) out of seven (7), or seventy-one percent (71%) of all responding Plans offering a **Healthy Families** product.
- Three (3) out of five (5), or sixty percent (60%) of all responding Plans offering a **Medicare** product.
- Four (4) out of five (5), or eighty percent (80%) of all responding Plans offering a **Commercial** product.



<u>Audio</u>

Question 25: Figure 3: Responses with Product Lines, Audio



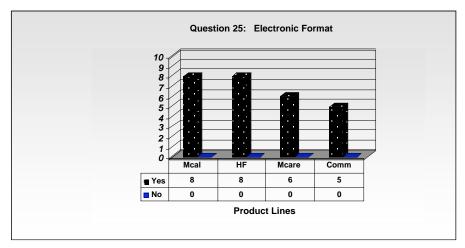
Question 25, Figure 3, Audio includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not the Plan's grievance materials are available on request in audio. Plans that offer grievance materials in audio include:

- Six (6) out of seven (7), or over eighty-five percent (85.7%) of all responding Plans offering a Medi-Cal product.
- Six (6) out of seven (7), or over eighty-five percent (85.7 %) of all responding Plans offering a **Healthy Families** product.
- Four (4) out of five (5), or eighty percent (80%) of all responding Plans offering a **Medicare** product.
- Four (4) out of five (5), or eighty percent (80%) of all responding Plans offering a **Commercial** product.



Electronic

Question 25: Figure 4: Responses with Product Lines, Electronic



Question 25, Figure 4, Electronic format includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not the Plan's grievance materials are available on request in electronic format. Plans that offer grievance materials in electronic format include:

- Eight (8) out of eight (8), or one-hundred percent (100%) of all responding Plans offering a Medi-Cal product.
- Eight (8) out of eight (8), or one-hundred percent (100%) of all responding Plans offering a **Healthy Families** product.
- Six (6) out of six (6), or one-hundred percent (100%) of all responding Plans offering a **Medicare** product.
- Five (5) out of five (5), or over sixty-six percent (100 %) of all responding Plans offering a Commercial product.



Are Plan health education and preventive health materials available on request in alternative formats?

- Large Print
- Braille
- Audio
- Electronic

Question 26: Table 1: All Responses, *1 Plan no Response = N

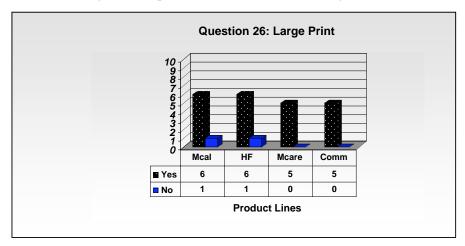
		Medi-	-CAL		HE	ALTHY	FAMILI	ES		MED	ICARE		COMMERCIAL				
	Yes	No	N/A	NR	Yes	No	N/A	NR	Yes	No	N/A	NR	Yes	No	N/A	NR	
Large	6	1	2	1	6	1	2	1	5	0	4	1	5	0	4	1	
print	60%	10%	20%	10%	60%	10%	20%	10%	50%	0	40%	10%	50%	0	40%	10%	
Braille	4	3	2	1	4	3	2	1	3	2	4	1	4	1	4	1	
Dianic	40%	30%	20%	10%	40%	30%	20%	10%	30%	20%	40%	10%	40%	10%	40%	10%	
Audio	5	2	2	1	5	2	2	1	4	1	4	1	4	1	4	1	
format	50%	20%	20%	10%	50%	20%	20%	10%	40%	10%	40%	10%	40%	10%	40%	10%	
Electronic	6	1	2	1	6	1	2	1	5	0	4	1	5	0	4	1	
LICCHOING	60%	10%	20%	10%	60%	10%	20%	10%	50%	0	40%	10%	50%	0	40%	10%	

One (1) Plan did not respond to this question.



Large Print

Question 26: Figure 1 Responses with Product Lines, Large Print



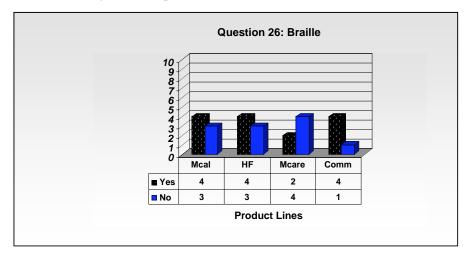
Question 26, Figure 1, Large Print includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not the Plan's health education and preventive health materials are available on request in large print. Plans that offer their health education and preventive health materials in large print include:

- Six (6) out of seven (7), or over eighty-five percent (85.7%) of all responding Plans offering a Medi-Cal product.
- Six (6) out of seven (7), or over eighty-five percent (85.7%) of all responding Plans offering a **Healthy Families** product.
- Five (5) out of five (5), or one-hundred percent (100%) of all responding Plans offering a **Medicare** product.
- Five (5) out of five (5), or one-hundred percent (100 %) of all responding Plans offering a **Commercial** product.



Braille

Question 26: Figure 2: Responses with Product Lines, Braille



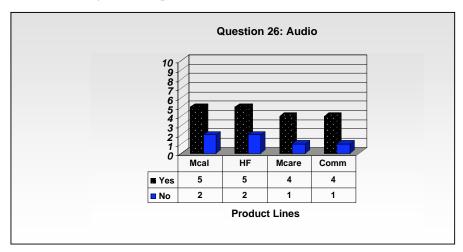
Question 26, Figure 2, Braille includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not the Plan's health education and preventive health materials are available on request in Braille. Plans that offer their health education and preventive health materials in Braille include:

- Four (4) out of seven (7), or fifty-seventy percent (57%) of all responding Plans offering a Medi-Cal product.
- Four (4) out of seven (7), or fifty-seventy percent (57%) of all responding Plans offering a **Healthy Families** product.
- Two (2) out of six (6), or thirty percent (33%) of all responding Plans offering a **Medicare** product.
- Four (4) out of five (5), or eighty percent (80%) of all responding Plans offering a **Commercial** product.



<u>Audio</u>

Question 26: Figure 3: Responses with Product Lines, Audio



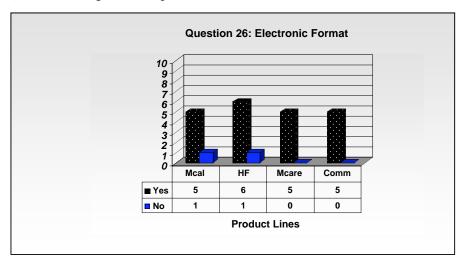
Question 26, Figure 3, Audio includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not the Plan's health education and preventive health materials are available on request in audio. Plans that offer their health education and preventive health materials in audio include:

- Five (5) out of seven (7), or seventy-one percent (71%) of all responding Plans offering a Medi-Cal product.
- Five (5) out of seven (7), or seventy-one percent (71%) of all responding Plans offering a **Healthy Families** product.
- Four (4) out of five (5), or eighty percent (80%) of all responding Plans offering a **Medicare** product.
- Four (4) out of five (5), or eighty percent (80%) of all responding Plans offering a **Commercial** product



Electronic

Question 26: Figure 4: Responses with Product Lines, Electronic



Question 26, Figure 4, Electronic format includes only plans that offer particular product lines (Medi-Cal, Healthy Families, Medicare, and Commercial). It breaks them down by whether or not the Plan's health education and preventive health materials are available on request in electronic format. Plans that offer their health education and preventive health materials in electronic format include:

- Five (5) out of Six (6), or eighty-three percent (83%) of all responding Plans offering a **Medi-Cal** product.
- Six (6) out of seven (7), or over eighty-five percent (85.7%) of all responding Plans offering a **Healthy Families** product.
- Five (5) out of five (5), or one-hundred percent (100%) of all responding Plans offering a **Medicare** product.
- Five (5) out of five (5), or over sixty-six percent (100 %) of all responding Plans offering a Commercial product.



Question 27

Is the Plan's web site accessible as defined by the W3C Web Accessibility Initiative?

Question 27: Table 1: All Responses, *1 Plan no Response = NR

	MEDI-CAL		HEALTHY FAMILIES		MEDICARE		COMMERCIAL	
	Yes	N/A	Yes	N/A	Yes	N/A	Yes	N/A
Images & animations: Use alt tags to describe function of each visual	6	2	6	2	4	4	4	4
	60%	20%	60%	20%	40%	40%	40%	40%
Image maps: Use client-side map & text for hotspots	6	2	6	2	4	4	4	4
	60%	20%	60%	20%	40%	40%	40%	40%
Multimedia: provide captioning and transcripts: audio, & descriptions of video	3	2	3	2	3	4	3	4
	30%	20%	30%	20%	30%	30%	30%	30%
Graphs & charts: Summarize in written description	4	2	4	2	4	4	4	4
	40%	20%	40%	20%	40%	40%	40%	40%
<i>Tables</i> : Make line-by-line reading sensible	7	2	7	2	5	4	5	4
	70%	20%	70%	20%	50%	40%	50%	40%
Scripts, applets, & plug-ins: Provide alternative content in case active features are inaccessible or unsupported	2	2	2	2	2	4	3	4
	20%	20%	20%	20%	20%	40%	30%	30%
Frames: Use no frames element and meaningful titles	3	2	3	2	4	4	4	4
	30%	20%	30%	20%	40%	40%	40%	40%



It is difficult to interpreter the results of this question because limitations in the online survey did not allow plans to indicate that they did not have a particular feature on their website. The results only indicate the number Plans that reported they were in compliance with a particular area but does not necessarily reflect the accessibility of a Plan's websites.

Images & Animations

- Six (6) Plans offering a **Medi-Cal** product.
- Six (6) Plans offering a **Healthy Families** product.
- Four (4) Plans offering a **Medicare** product.
- Four (4) Plans offering a Commercial product

Image Maps

- Six (6) Plans offering a **Medi-Cal** product.
- Six (6) Plans offering a **Healthy Families** product.
- Four (4) Plans offering a **Medicare** product.
- Four (4) Plans offering a **Commercial** product

Multimedia

- Three (3) Plans offering a **Medi-Cal** product.
- Three (3) Plans offering a **Healthy Families** product.
- Three (3) Plans offering a **Medicare** product.
- Three (3) Plans offering a **Commercial** product

Graphs & Charts

- Four (4) Plans offering a **Medi-Cal** product.
- Four (4) Plans offering a **Healthy Families** product.
- Four (4) Plans offering a **Medicare** product.
- Four (4) Plans offering a **Commercial** product

Tables

- Seven (7) Plans offering a **Medi-Cal** product.
- Seven (7) Plans offering a **Healthy Families** product.
- Five (5) Plans offering a **Medicare** product.
- Five (5) Plans offering a **Commercial** product



Scripts, Applets & Plug-ins

- Two (2) Plans offering a **Medi-Cal** product.
- Two (2) Plans offering a **Healthy Families** product.
- Two (2) Plans offering a **Medicare** product.
- Three (3) Plans offering a **Commercial** product

Frames

- Two (3) Plans offering a **Medi-Cal** product.
- Two (3) Plans offering a **Healthy Families** product.
- Four (4) Plans offering a **Medicare** product.
- Four (4) Plans offering a **Commercial** product

Comments from Plans:

1. Answer format does not facilitate reporting accuracy. Options differ from PDF version, which provides for two NA options for each web feature and each line of business (1-not on website, 2-don't have line of business). Online version does not offer these options and doesn't specify the meaning of unchecked boxes. In previous sections, I assumed unchecked boxes indicated NA-don't have this line of business. However, given the structure of question #27, unchecked boxes could mean (a) NA-don't have this line of business, (b) have line of business and web feature but do not comply with the guideline, or (c) have line of business but don't have feature on website.



Survey Feedback

Concerns over the Yes / No response format outlined as follows:

Two (2) Plans expressed concerns that the format limits the plans ability to indicated activities that were under development and does not provide the ability to acknowledge levels of progress a plan had made.

One (1) plans expressed several concern related to the yes/no format including:

- The format limits the plans ability to indicate those services that may have been partially but not fully completed.
- No ability to distinguish between those services that the plan directly delivers and those that the
 plan's contracted providers deliver. The plan wanted a mechanism to report if an activity had been
 delegated to an individual provider or medical groups.
- Benefit structures differ among different lines of business and within the lines of business themselves.
 - o The Medicare program provides a variety of coverage options.
 - Medi-Cal benefits and programs differ by county and contract type (COHS, GMC, Two Plan).

As indicated earlier despite OPA stating that they would not publicly report individual Plan responses, one plan cited concern over how the data would be used.

"Unclear about persons/entities with access to collected data and how the information will and can be used. Not intending to use information in a certain way is not the same as not using it so a complete view of the scope would have been appreciated."

One (1) Plan appreciated the overview of the survey as well as the glossary of terms.

One (1) Plan commented on the timing of the Disability Survey:

"We understand the importance of providing appropriate services to our members and we share the OPA's commitment to serving disabled people. We believe that health plans should provide meaningful information to their members regarding their ability to deliver these services. However, we continue to believe that full implementation of this survey tool should be delayed until it has been fully developed to meet the needs of all stakeholders. We look forward to continuing to work with you toward this shared goal. Thank you"

Several Plans indicated design changes that needed to be made to the survey format:

One (1) Plan indicated drop down comment box needed for "check all that apply" questions

All Plans indicated they wanted more space for comments

• One (1) plan indicated that long scrolling lists made the survey difficult to review and separate pages would be helpful as long as the survey had the ability to go back and review answers before submitting. This plan preferred a PDF form version with electronic form field that could be filled in.



General Recommendations

Create a disability community advisory committee

OPA should create a Disability Advisory Committee to advise OPA on health care access for people with disabilities including compliance with Federal and State disability laws and regulations. The members should be drawn from organizations serving people with disabilities and from the general public who have an interest in, and knowledge of disability and health care delivery issues.

Conduct focus groups

Because examining health care service delivery for consumers with disabilities is a new initiative for OPA, the agency should conduct focus groups to obtain consumer input. It should seek input from them as to what they would like/need to know about their HMO. It should also inquire about the formats through which consumers with disabilities would prefer to receive this information.

Incorporate questions about alternative formats into existing cultural and linguistic survey

At present, OPA annually sends Health Plans an extensive sixty-three (63) question survey regarding cultural and language services. A number of those questions already address communication access issues for deaf or hard of hearing individuals. Other questions seek information about Plans' printed materials in languages in addition to English. Those latter questions should also seek information about the extent to which Plans make materials available in alternative formats (large print, audio, Braille, and electronic format). In responses to the pilot Disability survey, Plans reported that they wanted to be able to indicate when they delegate the provision of alternative formats to Plan Partners, Medical Groups, or Provider Offices. The existing Cultural and Language survey already responds to that concern.

Background Information on Evaluating Accessibility of Websites (1)

Websites should be accessible for all users, including people with disabilities who use a variety of assistive and adaptive software and alternative input devices to interact with their computers.

Many blind and visually impaired users employ screen reader software that reads the content of a page to the users. People with hearing impairments rely on captioning as an alternate to audio content. Those with dexterity impairments will employ a variety of adaptive keyboards and input devices.

The world wide web consortium (http://www.w3.org/) established the web accessibility initiative (http://www.w3.org/WAI/) to provide standards for accessible website design. Section 508 of the assistive technology act builds upon those standards for websites and electronic business conducted on government websites. Many state and local governments have adopted the section 508 standards for their sites and those of organizations, agencies and companies that do business with them.

Accessibility is a function of both the structure of a website and the way in which content is organized and presented. A validator can verify the syntax of your pages (are their alt tags for photos and graphics? Are tables properly labeled? Are there skip navigation links?), however, that correct syntax does not guarantee that a document will be accessible). This represents only a small portion (20-25%) of a site's accessibility.

Some examples of automatic validators include:

- An automated accessibility validation tool such as Bobby (refer to [BOBBY]).
- An HTML validation service such as the W3C HTML Validation Service (refer to [HTMLVAL]).
- A style sheets validation service such as the W3C CSS Validation Service (refer to [CSSVAL]).

Sites should also be tested by consumers using screen readers and other adaptive technologies to determine if people with disabilities will be able to navigate the site, locate and understand the information on it.

¹ For more information on website accessibility guidelines and standards see:

Section 508 http://www.access-board.gov/508.htm.

[•] Web Content Accessibility Guidelines 1.0, http://www.w3.org/TR/WCAG10/.

[•] Web Content Accessibility Guidelines 2.0 http://www.w3.org/TR/WCAG20/.

Examples of Items to consider for accessibility:

- Complex graphics that convey important information (charts, graphs, illustrations) should be linked to detail descriptions (longdesc) that provide the same information for blind users.
- Audio/video content should be open captioned for hearing impaired users
- Text and background colors should provide good contract for people with low visions.
- Fonts should be easy to read, san-serif are preferable
- All pages should have a skip navigation link to enable blind users with screen readers to go directly to the body text on every page.
- All non text elements should have alt tags providing description of the graphic's content or purpose

Examples of tools that assist with evaluating the accessibility of websites include:

Commercial Software tools

- Lift http://usablenet.com
- Ramp Ascend http://deque.com
- InFocus http://ssbtechnologies.com

Free Tools

- WebExact http://www.webxact.com/
- The Wave http://www.wave.webaim.org
- A-prompt http://aprompt.snow.utoronto.ca/

Incorporate accessible website evaluation into the existing Cultural and Language survey

The existing OPA Cultural and Linguistic survey includes questions addressing the linguistic accessibility of California Health Plans' websites (15-17). OPA should incorporate a question that broadly addresses the disability-related accessibility of those websites. For example:

Has the Plan's website been assessed for disability-related access through an online web checker such as webxact (often referred to as Bobby Compliance) available for free at: http://webxact.watchfire.com/?

Utilize a different online survey tool

To improve the process by which plans report data, OPA utilized an online reporting system called Zoomerang (see http://www.zoomerang.com). The system greatly improved the efficiency of data analysis. However, the online system presented several challenges including:

- limitations in the visual layout for multi-part questions
- limitations in the ability to navigate the questions
- limitations in the ability to print responses when submitted
- limited space to make comments
- limitations in changing responses once submitted.

Despite these challenges, OPA should consider using an online reporting system in the future. But it should explore other survey tools that allow greater flexibility in the design, deployment, and analysis of survey data.

Policy Challenges and Recommendations

Responsibility for Accommodations

One of the greatest challenges in getting Health Plans to respond to the pilot survey was concern over how a Plan's responses might impact its liability if it does not as yet provide full access to health care services. As a result, considerable debate focused on where the responsibility ultimately should lie for ensuring access to health care services for people with disabilities. Some Health Plans declared that because services are delegated directly to Plan Partners (other health plans), medical groups, hospitals, and individual health providers OPA should target those entities for assessment. It is true that individual providers, medical groups, and hospitals are obligated to comply with federal and state laws that ensure the rights of people with disabilities. But managed care plans are required to ensure not only that the services they provide directly comply with the law, but also that services provided by contracted entities as a result of the contracted relationship are accessible to the greatest extent possible. (See appendices, Disability related Federal and State laws) (2)

Recommendation

- 1. Develop an educational brief for health plans and consumers with disabilities discussing consumers' rights as defined under the ADA and California Civil Codes and regulations to access healthcare services.
- 2. Offer training to DMHC agency officials, health plans, individual providers, medical groups, and hospitals regarding obligations under State and Federal disability rights laws.

Physical Access Barriers

Despite the legal obligation to comply with the ADA no one organization in California or nationally is specifically monitoring, tracking, and providing consumers with information on the physical accessibility of licensed health care provider facilities. The vast number of health care provider groups, individual health care providers, and other health care facilities such as hospitals and imaging facilities makes it difficult for a single agency to implement a comprehensive assessment and information dissemination program usable by consumers and payers. (3)

² Zamora-Quezada v. Health Texas Medical Group of San Antonio, 34 F.Supp.2d 433 (W.D. Tex. 1998)(denying defendant's motion for summary judgment because of fact question as to whether the HMOs regulated health care decisions made by the medical group, including referrals and admissions, and attempted to monitor and influence physicians' utilization patterns.); Woolfolk v. Duncan, 872 F.Supp. 1381 (E.D. Pa. 1995)(holding that where MCO has right and authority to interfere with and control a provider's treatment of enrollees, there is a genuine issue of material fact as to whether MCO is vicariously liable for provider's conduct under Title III of the ADA and Section 504.)

³ The regulations implementing the ADA include a broad set of building design specifications for new construction, additions, and remodeling: the Americans with Disabilities Act Standards for Accessible Design. California complies with these regulations through the California Building Standards Code, Title 24. The Division of the State Architect, Access Compliance (DSA-AC), promulgates building regulations for making buildings, structures, sidewalks, curbs, and related facilities accessible to and usable by persons with disabilities. Access compliance regulations apply to:

¹ Publicly funded buildings, structures, sidewalks, curbs, and related facilities,

^{2.} Privately funded public accommodations and commercial facilities, and

^{3.} Public housing and private housing available for public use statewide

Recommendation

- 1. OPA should explore opportunities to engage a broad group of stakeholders to facilitate a standardized approach for assessment and dissemination of information regarding the accessibility of individual health care provider facilities and other health care institutions, such as hospitals, imaging facilities, and laboratories.
- 2. OPA in collaboration with a Disability Advisory Committee should explore possible involvement with the Industry Collaboration Effort (ICE), a volunteer, multi-disciplinary team of providers, health plans, associations, state and federal agencies, and accrediting bodies working to improve health care regulatory compliance. For more information see http://www.iceforhealth.org/home.asp. ICE has a California Shared Commercial and Medicare Facility Site Review Survey that resulted from a statewide, multi-stakeholder effort to standardize and simplify the credentialing office review process. Disability-related physical access questions could be incorporated into the existing FSR. This
 - would create a uniform and mechanism for assessment and serve as a mechanism to provide OPA with information regarding the physical accessibility of contracted providers within Commercial and Medicare plan.
- 3. OPA should meet with Department of Health Services to determine approaches they are taking to amend the existing health plan FSR requirements to include more comprehensive disability-related physical access guidelines. This may provide OPA with information regarding the physical accessibility of contracted providers within Medi-Cal health plans.

Quality of Care Measures (4),(5), (6)

OPA's report card is a mechanism for consumers to evaluate the quality of health care services delivered by California Health Plans. Quality is defined in various ways, depending on consumers' needs. The Institute of Medicine (IOM) defines quality as the degree to which health services increase the likelihood of desired health outcomes and are consistent with current professional knowledge. Quality may also be seen as the degree to which actions taken by a Health Plan and its contracted entities maximize the probability of beneficial health outcomes for health plan members and minimize their risk of developing a primary disease or secondary condition. Quality can be evaluated through several dimensions, including:

- 1. Quality of resources (e.g. health providers facilities, scope of covered benefits)
- 2. Quality of service delivery (e.g. use of appropriate procedures/treatments for a given condition, timeliness of care, efficiency of health plan procedures)
- 3. Quality of outcome resulting from service (e.g. actual improvement in condition, reduction of risk of developing secondary conditions, reduction of harmful effects from poor health behaviors).

The OPA pilot survey documents the quality of health plan resources and service delivery in terms of the accessibility of health plans' services, facilities, and materials. Measures such as these are designed to enable individuals with disabilities to determine how effectively they can access various components of the care delivery system.

But the measures do not document one critical component: how a Plan's delivery of services actually affects members' health. Evaluations of health care quality are increasingly grounded in clinical performance measures [also called Health Plan Employer Data and Information Set (HEDIS) measures], and/or they are measured through consumer responses to satisfaction surveys [also called Consumer Assessment of Health Plans (CAHPS)]. Private sector quality monitoring organizations and state and federal regulators have selected these measures in order to compare clinical outcomes across managed care organizations.

The HMO Report Card currently reports on results of CAHPS surveys and HEDIS measures targeting diseases and conditions such as high blood pressure, diabetes, and asthma. People with disabilities are at a greater risk for developing secondary conditions. Therefore clinical performance measures are a critical component in presenting information about quality care. A defined set of quality outcome measures for seniors and persons with disabilities does not exist nationally.

However, a number of existing preventative care measures focusing on prevalent secondary conditions could be utilized. In addition, specialized health plans such as AXIS Healthcare in Minneapolis are using measures relevant to individuals with physical disabilities, particularly those with spinal cord injuries, such as the incidence of bowel impaction, urinary tract infections, and pressure sores. Several challenges exist in developing quality measures related to people with disabilities for use within health plans and to make comparisons across plans. These include:

⁶ S. Sofaer, S.F. Woolley, K.A. Kenny, B. Kreling, D. Mauery. A Meeting the Challenges of Serving People with Disabilities. A Resource Guide for Assessing the Performance on Managed Care Organizations.@ Report to ASPE. July 1998. http://aspe.hhs.gov/DALTCP/REPORT/RESOURCE.HTM



⁴ M. Mastal, and S, Palsbo, *Measuring the Effectiveness of Managed Care for Adults with Disabilities*. Centers for Health Care Strategies, December 2005.

⁵ S. Palsbo, P. Beatty, P. Parker, C. Duff. *Designing a Program Evaluation for a Multi-Organizational Intervention: The Minnesota Disability Health Options Project*, Center for Health Care Strategies, January 2004.

- A lack of access to accurate encounter data from the State of California, Centers for Medicaid and Medicare Services (CMS), and among the health plans themselves.
- Difficulties in defining the population or making statistical comparisons due to variations in diseases and conditions among seniors and persons with disabilities. This is particularly challenging when individuals do not have a Medi-Cal aid code.
- Members in commercial and government-based product lines differ in terms of socioeconomic factors such as family income and education levels. This may impact individual health quality outcomes, thereby making comparisons among different health plan product lines difficult.
- Fluctuating eligibility for Medi-Cal and Healthy Families may lead to more breaks in coverage
 as compared to members in commercial plans. These gaps in coverage impact continuity of care
 and may affect health outcomes.
- Scope of benefits and services vary from Plan to Plan and among individual Plan's product lines.
- The financial and technological resources necessary to collect, clean, and evaluate data hinder statewide implementation of quality measures.

Recommendation:

- 1. Work with the California Endowment or California Health Care Foundation to identify and allocate funding to pilot quality measures among a group of California health plans to promote the management of secondary conditions among targeted populations of people with disabilities.
- 2. Several Health Plans including CalOptima and Inland Empire Health Plan (IEHP) currently utilize CAHPS surveys targeted to individuals with disabilities. OPA should explore approaches to create incentives for other California Health Plans to utilize this survey as part of their annual consumer satisfaction evaluations.

Appendices

Disability Related Federal and State Laws

Federal Laws

Section 504 of The Rehabilitation Act of 1973

In 1973, Congress passed the Rehabilitation Act in a national effort to end discrimination on the basis of disability by agencies and organizations that receive or benefit from federal financial assistance. The act's Section 504 prohibits discrimination on the basis of disability in programs conducted by federal agencies, as well as programs receiving federal financial assistance, including state and local governments and private entities. The Section also requires all such agencies and entities to make their programs and activities accessible to people with disabilities. Health Plans directly receiving federal funding, such as those that offer Medicare product lines, are obligated to ensure access to their contracted health care services. In addition, the Department of Health Services is obligated to ensure compliance by contracted health plans and their contracted entities as a result of receiving federal funding for the Medi-Cal and Healthy Families program.

Title III of the Americans with Disabilities Act (ADA)

The Americans with Disabilities Act (ADA) was enacted in 1990 to provide a clear and comprehensive national mandate to end discrimination against individuals with disabilities throughout U. S. society. The law works to ensure that people with disabilities are given equal access to employment, public services, public accommodations, and telecommunications. Title III of the ADA prohibits discrimination on the basis of disability in the full and equal enjoyment of goods, services, facilities, privileges, and advantages of any place of public accommodation. Places of public accommodation identified by the ADA include, but are not limited to, stores, including pharmacies, and all health care providers, including hospitals, nursing homes, providers of psychiatric and psychological services, private physicians' offices, diagnostic centers, physical therapy centers, and health clinics. Individual providers and medical groups have a responsibility to ensure that their services are accessible to the greatest extent possible in accordance with the ADA. At the same time, managed care plans are required to ensure that the services they provide directly and those provided by contracted entities are accessible to the greatest extent possible.

State Laws

In addition to federal law, California state law guarantees the rights of people with disabilities in several sections of the civil code:

Unruh Civil Rights Act (California Civil Code Section 51): provides protection from discrimination by all business establishments, including housing and public accommodations, because of age, ancestry, color, disability, national origin, race, religion, sex and sexual orientation. This law makes a violation of the ADA a violation of California civil rights law and allows for punitive and compensatory damages in accessibility lawsuits

California Civil Code Section 54 through 55.2 ensures access for persons with disabilities:

"Individuals with disabilities or medical conditions have the same right as the general public to the full and free use of the streets, highways, sidewalks, walkways, public buildings, medical facilities, including hospitals, clinics, and physicians' offices, public facilities, and other public places."

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The Office of the Patient Advocate



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